



Babergh & Mid Suffolk District Council Local Plan

Sustainability Appraisal (SA): Scoping Report – April 2019







Contents

1.	Introduction	1
1.1	Background	1
1.2	The Babergh & Mid Suffolk (Joint) Local Plan	1
1.3	Babergh and Mid Suffolk's Current Development Plan	1
2.	Sustainability Appraisal (SA)	2
2.1	The Requirement for Sustainability Appraisal	2
2.2	The Sustainability Appraisal Process	3
2.3	The Aim and Structure of this Report	4
3.	Sustainability Context, Baseline and Objectives	5
3.1	Introduction	5
3.2	Policies, Plans and Programmes (Stage B1)	5
3.3	Baseline Information	19
3.4	Sustainability Issues and Problems and the formulation of SA Objectives	50
3.5	The Approach to Assessing the Plan	56
3.6	The Assessment of the Plan's Content	72



List of Tables

Table 1:	Other relevant policies, plans and programmes.....	5
Table 2:	Employment sectors within Suffolk.....	22
Table 3:	Comparison of Self-Containment of 2011 Travel to Work Areas (ONS).....	23
Table 4:	Summary of job growth for the Ipswich Economic Area (as implied by the East of England Forecasting Model (EEFM))	24
Table 5:	Strengths and weaknesses of the economy in Babergh	24
Table 6:	Strengths and weaknesses of the economy in Mid Suffolk	25
Table 7:	Future Delivery by Number of Bedrooms and Tenure.....	26
Table 8:	Summary of Accommodation needs in the Plan area (Babergh and Mid Suffolk) 2016-36.....	28
Table 9:	Gypsy and Traveller Population	28
Table 10:	Gypsy and Traveller Population by Tenure	29
Table 11:	Estimated Total Population Nationally, Regionally and by District.....	30
Table 12:	Population Growth by IEA Local Authority 2001-2016	30
Table 13:	Suffolk Population Summary 2017	31
Table 14:	Space Standards for Outdoor Sports Facilities	32
Table 15:	Space needs for additional population – outdoor sports facilities	32
Table 16:	Percentage of Pupils Achieving 5+ A* -C Grades in 2014/2015	33
Table 17:	Revised GCSE and equivalent results in Suffolk: 2013 to 2014	33
Table 18:	Capital Maintenance Programme for 2011 / 2012.....	39
Table 19:	Key Transport issues for Babergh	39
Table 20:	Key Transport Issues for Mid Suffolk.....	40
Table 21:	Heritage Assets within both Districts	41
Table 22:	Main River Map of Suffolk	46
Table 23:	Examples of Redesign, Mitigation and Offsetting in the demolition/construction phase.....	48
Table 24:	Primary Methods of Waste Collection and Management 2001/2002	49
Table 25:	Key Sustainability Issues and Problems	50
Table 26:	The SA Objectives	54
Table 27:	SA Framework for Assessing the Plan.....	57
Table 28:	SA Framework for Assessing the Plan's Site Options.....	64



Glossary of Acronyms

AA	Appropriate Assessment
ALC	Agricultural Land Classification
AQMA	Air Quality Management Area
B&MSDC	Babergh & Mid Suffolk District Council
DCLG	Department for Communities and Local Government
DPD	Development Plan Document
EA	Environment Agency
EC	European Commission
ECC	Essex County Council
EU	European Union
Ha	Hectare
HE	Historic England
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
LB	Listed Building
LCA	Landscape Character Assessment
LPA	Local Planning Authority
MSA	Minerals Safeguarding Area
NE	Natural England
NEGC	North Essex Garden Communities
NHS	National Health Service
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PDL	Previously Developed Land
PPG	Planning Practice Guidance
PRoW	Public Right of Way
PTW	Powered Two Wheeler
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHMA	Strategic Housing Market Assessment
SHLAA	Strategic Housing Land Availability Assessment
SM	Scheduled Monument
SO	SEA Objective
SPA	Special Protection Area
SSSI	Site of Specific Scientific Interest



SuDS Sustainable Drainage System
UK United Kingdom
WPA Waste Planning Authority



1. Introduction

1.1 Background

Babergh & Mid Suffolk District Council (B&MSDC) have commissioned Place Services to undertake an independent Sustainability Appraisal (SA) for the Babergh & Mid Suffolk (Joint) Local Plan.

1.2 The Babergh & Mid Suffolk (Joint) Local Plan

The Babergh & Mid Suffolk (Joint) Local Plan (referred to hereafter as the Plan) responds to a national requirement that Local Planning Authorities (LPAs) must set planning policies in a local authority area. Local plans must be positively prepared, justified, effective and consistent with national policy in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework 2019.

The Local Plan is an important document which will provide the strategy for the growth of Babergh and Mid Suffolk. It will set out the strategy for development up to 2036, including land allocations. Once adopted, the Plan will replace the existing local planning policies for both Babergh and Mid Suffolk.

In accordance with the NPPF standard methodology the Plan has to accommodate identified housing needs along with employment and community facilities and services in Babergh and Mid Suffolk respectively. The new Joint Local Plan will set out a strategy to accommodate this in full in accordance with national policy requirements. Preventing growth across the two Districts is not an option. Levels of housing need in the area are high and new homes will have to be provided to meet this need.

An initial 'high-level' Regulation 18 Local Plan, responding to 'Issues & Options' was consulted on in 2017.

1.3 Babergh and Mid Suffolk's Current Development Plan

The current Development Plan for Babergh consists of the saved policies of the Babergh Local Plan, Alteration No. 2 (2006), the Babergh Local Plan (2011 – 2031) Core Strategy and Policies (2014) and 'made' (adopted) Neighbourhood Plans.

For Mid Suffolk, the Development Plan comprises the saved policies of the Mid Suffolk District Local Plan (1998), the First Alteration to the Mid Suffolk Local Plan (2006), the Mid Suffolk District Core Strategy Development plan Document (2008), and the Mid Suffolk District Core Strategy Focused Review (2012), the Stowmarket Area Action Plan and also 'made' (adopted) Neighbourhood Plans.

Additionally, the Minerals Core Strategy (incorporating Development control Policies) (2008) and the Waste Core Strategy Development Plan Document (2011) produced by Suffolk County Council also form part of the Development Plan. A new Suffolk Minerals and Waste Local Plan was submitted to the Planning Inspectorate in December 2018 for an Examination in Public (EiP) in summer 2019.

The new Joint Local Plan will replace the Local Plans and alterations (saved policies), the Core Strategies, and the Stowmarket Area Action Plan.



2. Sustainability Appraisal (SA)

2.1 The Requirement for Sustainability Appraisal

The requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) emanates from a high level national and international commitment to sustainable development. The most commonly used definition of sustainable development is that drawn up by the World Trade Commission on Environment and Development in 1987 which states that sustainable development is:

'Development that meets the needs of the present without compromising the ability of future generations to meet their own needs'

This definition is consistent with the themes of the NPPF, which draws upon The UK Sustainable Development Strategy Securing the Future's five 'guiding principles' of sustainable development: living within the planet's environmental limits; ensuring a strong, healthy and just society; achieving a sustainable economy; promoting good governance; and using sound science responsibly.

SEA originates from the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment" (the 'SEA Directive') which came into force in 2001. It seeks to increase the level of protection for the environment; integrate environmental considerations into the preparation and adoption of plans and programmes; and promote sustainable development. The Directive was transposed into English legislation in 2004 by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulation') which requires an SEA to be carried out for plans or programmes,

'subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and required by legislative, regulatory or administrative provisions'.

This includes Local Plans. The aim of the SEA is to identify potentially significant environmental effects created as a result of the implementation of the plan or programme on issues such as:

'biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors' as specified in Annex 1(f) of the Directive.

SA examines the effects of proposed plans and programmes in a wider context, taking into account economic, social and environmental considerations in order to promote sustainable development. It is mandatory for Local Plans to undergo a Sustainability Appraisal in accordance with the Planning and Compulsory Purchase Act 2004 as amended by the Planning Act 2008, and in accordance with paragraph 165 of the NPPF.

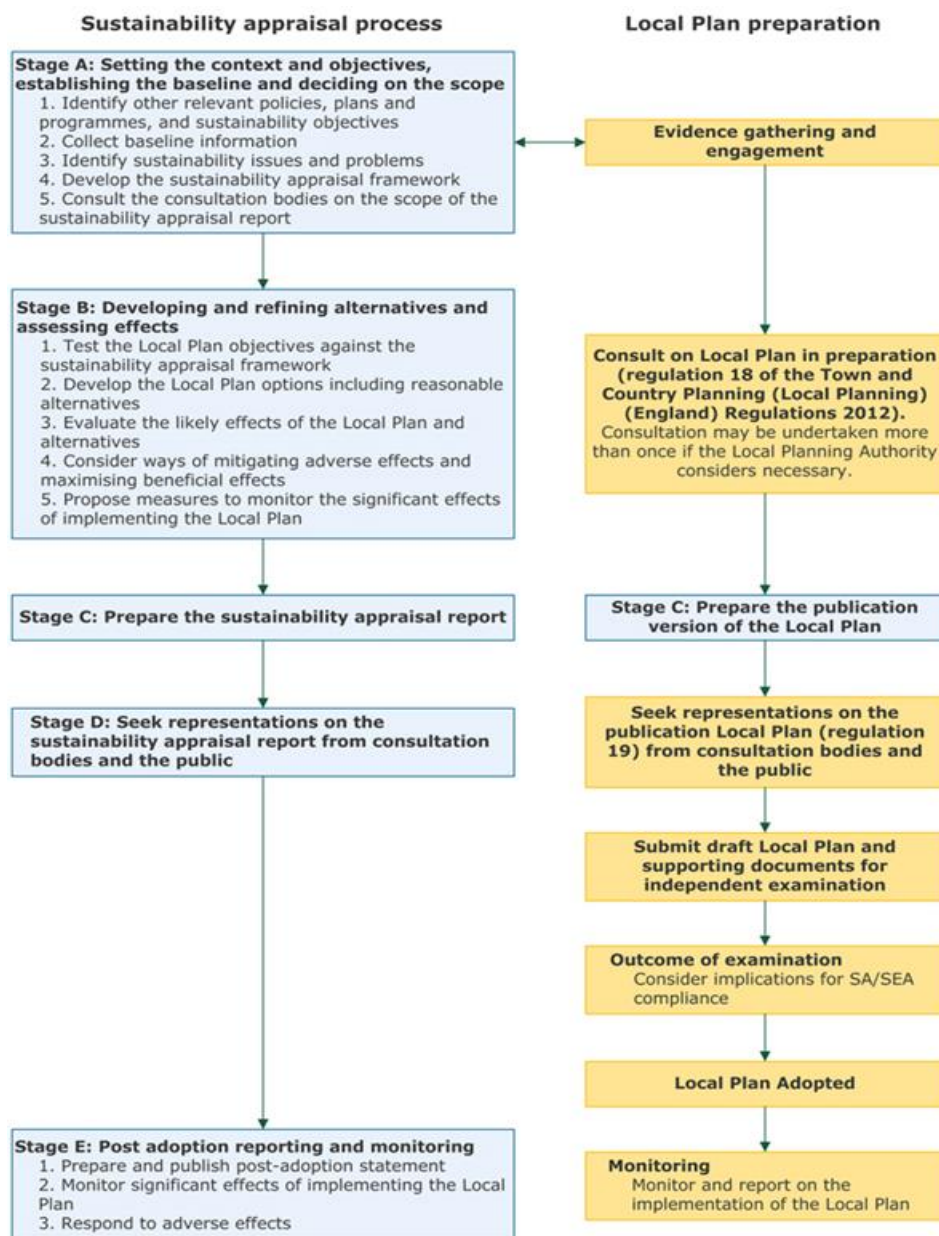
Whilst the requirements to produce a SA and SEA are distinct, Government guidance considers that it is possible to satisfy the two requirements through a single approach providing that the requirements of the SEA Directive are met. This integrated appraisal process will hereafter be referred to as SA.



2.2 The Sustainability Appraisal Process

The methodology adopted for the SA of the Babergh & Mid Suffolk (Joint) Local Plan at this stage follows that of the Sustainability Appraisal process. The following 5 sequential stages are documented below.

Figure 1: Stages in the Sustainability Appraisal Process and Local Plan Preparation



Source: Planning Practice Guidance – Sustainability appraisal requirements for local plans (Paragraph: 013 Reference ID: 11-013-20140306 Revision date: 06 03 2014)



2.3 The Aim and Structure of this Report

The aim of this Report is to respond to Stage A of the SA process shown in the previous figure, to:

- Identify other relevant policies, plans and programmes, and sustainability objectives
- Collect baseline information
- Identify sustainability issues and problems
- Develop the sustainability appraisal framework
- Consult the consultation bodies on the scope of the sustainability appraisal report

It should be noted that Babergh & Mid Suffolk District Council consulted on a Scoping Report prior to the commissioning of Place Services as consultants to undertake stages B and C of the SA. The scope of the SA has at this stage been refreshed in line with best practice and to respond to the changing requirements of planning policy as espoused in the NPPF, 2019.

3. Sustainability Context, Baseline and Objectives

3.1 Introduction

The SA of the Local Plan is required to set the scope for the assessment of options and Plan content relevant to that Plan area. Stage A of the SA process sets out how the context and the objectives of the SA should be set, whilst establishing the baseline relevant to the Plan area. This involves:

- Identifying other relevant policies, plans and programmes, and sustainability objectives;
- Collecting baseline information;
- Identifying sustainability issues and problems; and
- Developing the SA frameworks (formulating relevant criteria against which the Plan's policy content and site allocations will be assessed).

The following section outlines the relevant plans and programmes and the baseline information profile for the Local Plan area and where relevant beyond.

3.2 Policies, Plans and Programmes (Stage B1)

Local Plans must have regard to existing policies, plans and programmes at national and regional levels and strengthen and support other local plans and strategies. It is therefore important to identify and review those policies, plans and programmes and Sustainability Objectives which are likely to influence the Local Plan at an early stage. The content of these plans and programmes can also assist in the identification of any conflicting content of plans and programmes in accumulation with the Local Plan. Local supporting documents have also been included within this list as they will significantly shape policies and decisions in the area.

It is recognised that no list of plans or programmes can be definitive and as a result this report describes only the key documents which influence the Plan. Table 1 outlines the key documents, whilst a comprehensive description of these documents together with their relevance to the Plan is provided within Annex A.

Table 1: Other relevant policies, plans and programmes

International Plans and Programmes
European Commission (EC) (2011) A Resource-Efficient Europe – Flagship Initiative Under the Europe 2020 Strategy, Communication from the Commission to the European Parliament, the Council, The European Economic and Social Committee of the Regions.
European Landscape Convention (Florence, 2002)



European Union Water Framework Directive 2000

European Union Nitrates Directive 1991

European Union Noise Directive 2002

European Union Floods Directive 2007

European Union Air Quality Directive 2008 (2008/50/EC) and previous directives (96/62/EC; 99/30/EC; 2000/69/EC & 2002/3/EC)

European Union Directive on the Conservation of Wild Birds 2009

European Union Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora 1992

European Community Biodiversity Strategy to 2020

United Nations Kyoto Protocol

World Commission on Environment and Development 'Our Common Future' 1987

The World Summit on Sustainable Development Johannesburg Summit 2002

Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

The Conservation of Habitats and Species Regulations, 2010

Review of the European Sustainable Development Strategy (2009)

Environment 2010: Our Future, Our Choice (2003)

SEA Directive 2001

The Industrial Emissions Directive 2010

Energy Performance of Buildings Directive 2010 on the energy performance of buildings 2010/31/EU

The Drinking Water Directive 1998

The Packaging and Packaging Waste Directive 1994

EU Seventh Environmental Action Plan (2002-2012)

European Spatial Development Perspective (1999)

European Convention on the Protection of the Archaeological Heritage (Valletta, 1992)

Aarhus Convention (1998)

National Plans and Programmes



Population and Health

Working for a Healthier Tomorrow – Same Carol Black's Review of the health of Britain's working age population, 2008

Tackling Health Inequalities – A Programme for Action 2003 (including the 2007 Status Report on the Programme for Action)

The Egan Review – Skills for Sustainable Communities, 2004

Housing

Code for Sustainable Homes, 2014

Sustainable Communities: Building for the Future, 2003

Sustainable Communities, Settled Homes, Changing Lives – A Strategy for Tackling Homelessness (ODPM), 2005

Planning policy for Traveller Sites

Biodiversity by Design: A Guide for Sustainable Communities (Town and Country Planning Association), 2004

Biodiversity

Biodiversity Indicators in Your Pocket (2010)

Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services

UK Post-2010 Biodiversity Framework

The Guidance for Local Authorities on Implementing the Biodiversity Duty, 2007

Conserving Biodiversity – The UK Approach, 2007

Working with the Grain of Nature: a Biodiversity Strategy for England, 2002

Environment

UK National Ecosystems Assessment, 2009-2011

The Conservation of Habitats and Species Regulations, 2010

A Strategy for England's Trees, Woodlands and Forests, 2007

Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations)

The Natural Environment and Rural Communities Act, 2006

The Geological Conservation Review (GCR) (ongoing)



Safeguarding our Soils: A Strategy for England (Defra, 2009)

Natural England's Green Infrastructure Guidance, 2009

Waste Strategy for England, 2007

Climate Change

Climate change and biodiversity adaptation: the role of the spatial planning system – a Natural England commissioned report, 2009

Planning for Climate Change – Guidance and Model Policies for Local Authorities, 2010

Climate Change Act, 2008

Stern Review of the Economics of Climate Change, 2006

UK Carbon Plan, 2011

Energy Act, 2011

Energy White Paper: Meeting the Energy Challenge, 2007

Health Effects of Climate Change in the UK 2008 – An update of the Department of Health Report 2001/2002

Landscape

The Countryside in and Around Towns: A vision for connecting town and country in the pursuit of sustainable development, 2005

Wildlife and Countryside Act, 1981

The Countryside and Rights of Way (CRoW) Act, 2000

Natural Environment and Rural Communities Act 2006

Environmental Quality in Spatial Planning 2005

Nature Nearby: Accessible Green Space Guidance, 2010

Accessible Natural Green Space Standards in Towns and Cities: A Review and Toolkit for their implementation, 2003

Open Space Strategies: Best Practice Guidance (CABE and the Greater London Authority), 2009

UK Shared Framework for Sustainable Development; One Future- Different Paths, 2005

UK Sustainable Development Strategy: Securing the Future, 2005

Countryside and Rights of Way Act, 2000

World Class Places: The Government's Strategy for Improving Quality of Place, 2009



Building a Greener Future: Policy Statement (July 2007)

Model Procedures for the Management of Land Contamination – Contaminated Land Report 11 (September 2004)

Water

Water Resources Strategy for England and Wales, 2009

Future Water: The Government's Water Strategy for England, 2008

Flood and Water Management Act, 2010

Making Space for Water: Taking Forward a New Government Strategy for Flood and Coastal Erosion Risk Management, 2005

Water for People and the Environment: A Strategy for England and Wales, 2009

Underground, Under Threat – Groundwater protection: policy and practice (GP3)

Transport

Delivering a Sustainable Transport System, 2008

The Future of Transport White Paper – A Network for 2030 (2004)

Low Carbon Transport: A Greener Future – A Carbon Reduction Strategy for Transport, 2009

Historic Environment

Historic Environment: A Force for the Future, 2001

The National Heritage Protection Plan (NHHP) 2011-2015

Planning (Listed Buildings and Conservation Areas) Act, 1990

Air

The Future of Air Transport White Paper (December 2003) (to be superseded by Developing a sustainable framework for UK aviation once adopted)

Developing a Sustainable Framework for UK Aviation – Scoping document (March 2011)

Aviation Policy Framework, 2013

The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, 2007

Planning Documents

Planning and Compulsory Purchase Act 2004



Planning Act, 2008

World Class Places: The Government's Strategy for Improving Quality of Place, 2009

Localism Act 2011

Planning Practice Guidance (updated)

National Planning Policy Framework (February 2019)

Draft revised National Planning Policy Framework, MHCLG (March 2018)

Community Infrastructure Levy: An Overview, DCLG (9th May 2011)

Sub-national Plans and Programmes

Population & Health

Living with Climate Change in the East of England – Summary Report supported by technical report, 2003 (RSS)

Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028

Joint Health and Wellbeing Strategy for Suffolk (2012-2022)

NHS Suffolk – Your Care Matters – Strategic Plan 2008-2013 (March 2009)

Ipswich and East CCG Integrated Plan 2012- 2014

West Suffolk CCG Integrated Plan 2012- 2014

Suffolk JSNA Health and Care Assessments

The State of Suffolk Report (June 2015)

Police and Crime Plan for Suffolk (2013- 2017)

Western Area Community Safety Partnership (2013-14)

State of Children in Suffolk 2014

Suffolk Community Foundation- Hidden Needs Report (2011 and 2016)

Moving Forward: Travel and Health in Suffolk The 2013 Annual Public Health Report

Suffolk County Council Comprehensive Equalities Policy 2009 – 2012

Suffolk's Strategy for Learning 2004-9: The Single Plan (March 2004)

Suffolk County Council – School Organisation Plan 2006-11 (August 2006)



School Organisation Review (December 2006)

Gypsy, Traveller & Travelling Show people Accommodation Assessment (October 2013)

Suffolk Planning Biodiversity Action Plan (2012)

The Stour and Orwell Estuaries: scheme of management, and management strategy (Suffolk Coasts and Heaths) (2010) Updated 2013 – 2018

The Suffolk Landscape Character Assessment (SCC, 2011)

Essex and South Suffolk Shoreline Management Plan (Oct 2010) (Environment Agency)

Suffolk Local authorities – Air Quality Management & New Development, 2011

Suffolk Climate Action Plan 3, July 2012

Suffolk Growth Strategy (2013)

New Anglia LEP Strategic Economic Plan (2013)

Suffolk Rural Action Plan 2009/10 -2012/13

Suffolk Supporting People Five Year Strategy 2005-2010 (Aug 2005)

Ipswich and East Clinical Care Group Integrated Plan 2012- 2014

Joint Health and Wellbeing Strategy for Suffolk (2012-2022)

Housing

Suffolk Supporting People Five Year Strategy 2005-2010 (August 2005)

The State of Suffolk Report 2011

Suffolk Rural Action Plan 2009/10 – 2012/13

Transforming Suffolk, Suffolk's Community Strategy 2008 to 2028

The East of England Housing Statement – People, Places, Homes: Priorities for Housing and Regeneration in the East of England 2010-2014

Water

Anglian River Basin District Management Plans (RBMP) 2015

Anglian Water – Water Resources Management Plan 2015

Environmental Capacity in the East of England: Applying an Environmental Limits Approach to the Haven Gateway, 2008



Waste for People and the Environment: Water Resources Strategy Regional Action Plan for Anglian Region (Environment Agency) 2009

Air

Suffolk Climate Action Plan 3, 2012

Suffolk Local Authorities – Air Quality Management & New Development, 2011

Material Assets

Joint Municipal Waste Management Strategy for Suffolk 2003-2020 (Adopted 2003/ Addendum 2008)

SCC – Adopted Mineral Core Strategy, 2008

SCC – Adopted Minerals Site Specific Allocations DPD, 2009

SCC – Adopted Waste Core Strategy (including DM Policies), 2011

Suffolk Local Geodiversity Action Plan, 2006

Suffolk Planning Biodiversity Action Plan, 2012

Suffolk Nature Strategy (Wild Anglia, 2014)

Butterfly Conservation- Regional Action Plan for Anglia, 2000

Suffolk Climate Action Plan 3, 2012

Climate Change

Living with Climate Change in the East of England – Summary Report supported by technical report, 2003 (RSS)

Environment, Our Future: Regional Environment Strategy for the East of England, East of England Regional Assembly and East of England Environment Forum, 2003 (RSS)

Developing ADAPTATION to Climate Change in the East of England, 2011

East Suffolk Catchment Flood Management Plan, 2009

The Suffolk Climate Action Plan 3, 2012

Suffolk Local Flood Risk Management Strategy, 2012

A summary of Climate Change Risks for the East of England, 2012

Biodiversity

Suffolk Planning Biodiversity Action Plan, 2012



Butterfly Conservation – Regional Action Plan for Anglia, 2000
Suffolk Geodiversity Action Plan, 2006
Suffolk Biodiversity Action Plan, updated December 2004
BSI PAS 2010 (2006)
Dedham Vale AONB and Stour Valley Management Plan 2010-2015
The Stour and Orwell Estuaries: scheme of management, and management strategy (Suffolk Coasts and Heaths) (2010) updated 2013-2018
Essex and South Suffolk Shoreline Management Plan, 2010 (Environment Agency)
Suffolk Planning Biodiversity Action Plan, 2012
Historic Environment
Suffolk Heritage Strategy, 2014
Suffolk Local Geodiversity Action Plan, 2006
Essex and South Suffolk Shoreline Management Plan, 2010 (Environment Agency)
SCC – Adopted Mineral Core Strategy, 2008
SCC – Adopted Minerals Site Specific Allocations DPD, 2009
Landscape
Analysis of Accessible Natural Greenspace Provision for Suffolk (Natural England 2010)
Suffolk Countryside Strategy, 2000
Greenways Countryside Project, Management Strategy 2005-2010 (2005) (SCC)
'In Step with Suffolk' Rights of Way Improvements Plan 2006-2016 (SCC) 2006
The Suffolk Landscape Character Assessment (SCC, 2011)
The Suffolk Historic Landscape Characterisation (SCC, version 3 2008)
Economy
New Anglia LEP Strategic Economic Plan, 2013
Suffolk Rural Action Plan 2009/10- 2012/13



Regional Tourism Strategy 2008-2010

Suffolk Coast Tourism Strategy 2013-2023

West Suffolk Employment Land Review, 2009

Transport & Connectivity

Haven Gateway – Ipswich A14 Corridor Study, 2007

Update of the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area; Babergh District Council, Ipswich Borough Council, Mid-Suffolk District Council and Suffolk Coastal District Council, 2015

Suffolk Bus Strategy, 2006-2011 (March 2006)

Suffolk County Council, Local Transport Plan 2011-2031; 2006-2011 (2012;2006)

Ipswich and Waveney Economic Areas – Employment Lands Needs Assessment – Final Report, 2016

Local Plans and Programmes

Babergh DC Local Plan (2006)

Mid Suffolk DC Local Plan (1998)

Housing Strategy 2012-15 (Babergh Mid Suffolk District Council, 2012)

Greater Haven Gateway Housing Strategy 2010-2015

Babergh Infrastructure Delivery Plan (February 2013)

Mid Suffolk Infrastructure Delivery Plan (May 2014)

Population and Health

Babergh and Mid Suffolk Equality Objectives (2012-2016)

Haven Gateway Green Infrastructure Study (April 2008)

Update of the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area (August 2015)

Babergh Open Space, Sport and Recreation Strategy (September 2010)

A Green Infrastructure Framework for Babergh District (August 2012)

Green Infrastructure Assessment for Mid Suffolk- Evidence base for the West of Babergh District (August 2012)

Green Infrastructure Assessment for Mid Suffolk (September 2014)



Housing

Babergh Housing Strategy 2004-2009

Babergh Homelessness Review and Strategy 2003

Babergh Housing Needs Surveys, 2004 & 2008

Babergh Housing Supply and Demands analysis, 2004

BDC, IBC, MSDC & SCDC – Affordable Housing Viability Study, 2009

MSDC – Strategic Housing Land Availability Assessment (SHLAA, update 2011) (2nd update January 2012)

MSDC – Five Years Supply of Housing Land (2011-2016) 2011

MSDC – Housing Strategy Action Plan 2010-2015, 2011

MSDC – Community Policy Panel – Housing Implementation Plan, 2011

BDC, IBC, MSDC & SCDC – Strategic Housing Market Assessment (SHMA), 2012

Ipswich, Babergh, Mid Suffolk Strategic Housing needs assessment, 2012

Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA), May 2017

B&MSDC Draft Strategic Housing and Economic Land Availability Assessment (SHELAA), August 2017

MSDC Housing Needs Study (May 2008)

BDC &MSDC Strategic Housing Market Assessment (May 2017, & Partial Update January 2019)

B&MSDC Topic Paper: Settlement Hierarchy Review, August 2017

Water

Babergh Infrastructure Delivery Plan, 2013

Mid Suffolk Infrastructure Delivery Plan, 2014

Babergh Water Cycle Study, 2011

Haven Gateway Water Cycle Study, 2009

Air

2015 Updating and Screening Assessment for BDC and MSDC, 2015

Air Quality Annual Status Report, 2018



Material Assets

Contaminated Land Strategy, Babergh DC, 2009

Mid Suffolk Contaminated Land Strategy, 2003

Babergh Infrastructure Delivery Plan, 2013

Mid Suffolk Infrastructure Delivery Plan, 2014

Climate Change

Babergh DC Strategic Flood Risk Assessment, 2009

Mid Suffolk District Council Strategic Flood Risk Assessment, 2008

Community Energy Project in Sudbury (2000-2003)

The Stour & Orwell Estuaries Management Strategy 2015-2020 (draft May 2016)

Biodiversity

Core Strategy Focused review habitat regulations Assessment, 2011

SAAP Habitat Assessment 2011

Mid Suffolk Contaminated Land Strategy, 2003

Contaminated Land Strategy, Babergh DC, 2009

Babergh Green Infrastructure Framework, 2012

Historic Environment

Glemsford, Heritage Economic Regeneration Scheme, 2000-2003

Sudbury, Heritage Economic Regeneration Scheme (2003-2006)

Pin Mill Regeneration (2006-2010)

Mid Suffolk Contaminated Land Strategy (revised 2003)

Contaminated Land Strategy, Babergh DC, 2009

Landscape

Joint Babergh and Mid Suffolk Landscape Guidance 2015

Babergh and Mid Suffolk Heritage and Settlement Sensitivity Assessment March 2018



Settlement Sensitivity Assessment - Landscape Fringes of Ipswich July 2018

Economy

Babergh & Mid Suffolk DC: Joint Town Centres & Retail Study, 2015

Babergh District Retail Study, 2008 – Babergh retail evidence update 2012

BDC – Sudbury and Hadleigh Town Centre Health Check, 2011

Sudbury Retail Study- Stage 1, 2011

Babergh Infrastructure Delivery Plan, 2013

Mid Suffolk Infrastructure Delivery Plan, 2014

Babergh Local Transport Study (Jan 2010) Babergh LDF – Transport Impacts, 2010

Sudbury Transport Study (Aug 2011) (Oct 2011)

Mid Suffolk Contaminated Land Strategy, 2003

MSDC Employment Land Study, 2011

Stowmarket Masterplan and SAAP 2013 with supporting retail studies Donaldson's 2007

Haven Gateway – Employment Land Review & Strategic Site Study, 2009

Haven Gateway – Driving the Haven Gateway Forward – The economic impact of the ports & logistics sector, 2010

Transport and Connectivity

Local Transport Action Plan for Capel St Mary, 2006

Babergh Local Transport Study Babergh LDF – Transport Impacts, 2010

Sudbury Transport Study (Aug 2011) (Oct 2011)

Stowmarket Transport Strategy Draft, 2010

Babergh District Retail Study, 2008 – update 2012

Local Reports and Assessments (Evidence Base)

Babergh & Mid Suffolk Joint Local Plan – Transport Modelling

B&MSDC Plan Viability Assessment

B&MSDC JLP Habitats Regulations Assessment



Babergh and Mid Suffolk Community Infrastructure Study Review Viability Study
B&MSDC Revised Infrastructure Delivery Plan
B&MSDC Strategic Housing & Economic Land Availability Assessment (SHELAA)
Ipswich Economic Area Employment Land Supply Assessment
Babergh & Mid Suffolk Open Space Assessment
Suffolk Coast Recreational Avoidance and Mitigation Strategy (RAMS)
Ipswich Fringe Settlement Sensitivity Assessment
Babergh & Mid Suffolk Brownfield Land Register
Ipswich Economic Area Sector Needs Assessment
B&MSDC Draft Strategic Housing & Economic Land Availability Assessment, 2017
B&MSDC Topic Paper: Settlement Hierarchy Review, 2017
B&MSDC JLP Sustainability Appraisal, 2017
Babergh & Mid Suffolk Joint Annual Monitoring Report 2017-2018 (2018)
Babergh & Mid Suffolk Sustainability Appraisal Scoping Report, 2017
Economic Land Needs Assessment – Ipswich & Waveney Economic Areas, 2016
Babergh & Mid Suffolk Town Centres & Retail Study, 2015
Babergh & Mid Suffolk Community Infrastructure Levy Viability Study – Report Addendum: Viability Update on Revised Affordable Housing Thresholds, 2015
Babergh & Mid Suffolk Community Infrastructure Levy Viability Study, 2014
Mid Suffolk Infrastructure Delivery Plan, 2014
Babergh Infrastructure Delivery Plan, 2013
B&MSDC Services Facilities Audit, 2017
Mid Suffolk Functional Clusters Report, 2017

3.3 Baseline Information

This sub-section details the Baseline Information profile for the strategic area relevant to the content of the Local Plan. The following section outlines a summary of the key baseline information and therefore the current state of the environment for the Districts. The SEA Directive requires the production of the following information:

‘The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;’ Annex 1(b);

The environmental characteristics of areas likely to be significantly affected;’ Annex 1(c); and

Any existing problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance such as areas designated pursuant to Directives 79/409/EEC and 92/43/ECC’ Annex 1(d).’

The baseline information identifies current sustainability issues and problems in the Plan Area which should be addressed and provides a basis for predicting and monitoring the effects of implementing the document. To ensure the data collected was relevant and captured the full range of sustainability issues, it was categorised under 13 thematic topics. They cover all the topics referred to in Annex 1(f) of the SEA Directive and follow the order of:

- Economy and employment
- Housing
- Population and society
- Health and wellbeing
- Transport and connectivity
- Cultural heritage
- Biodiversity and nature conservation
- Landscapes
- Water
- Climate and energy
- Air
- Waste, soils and Minerals

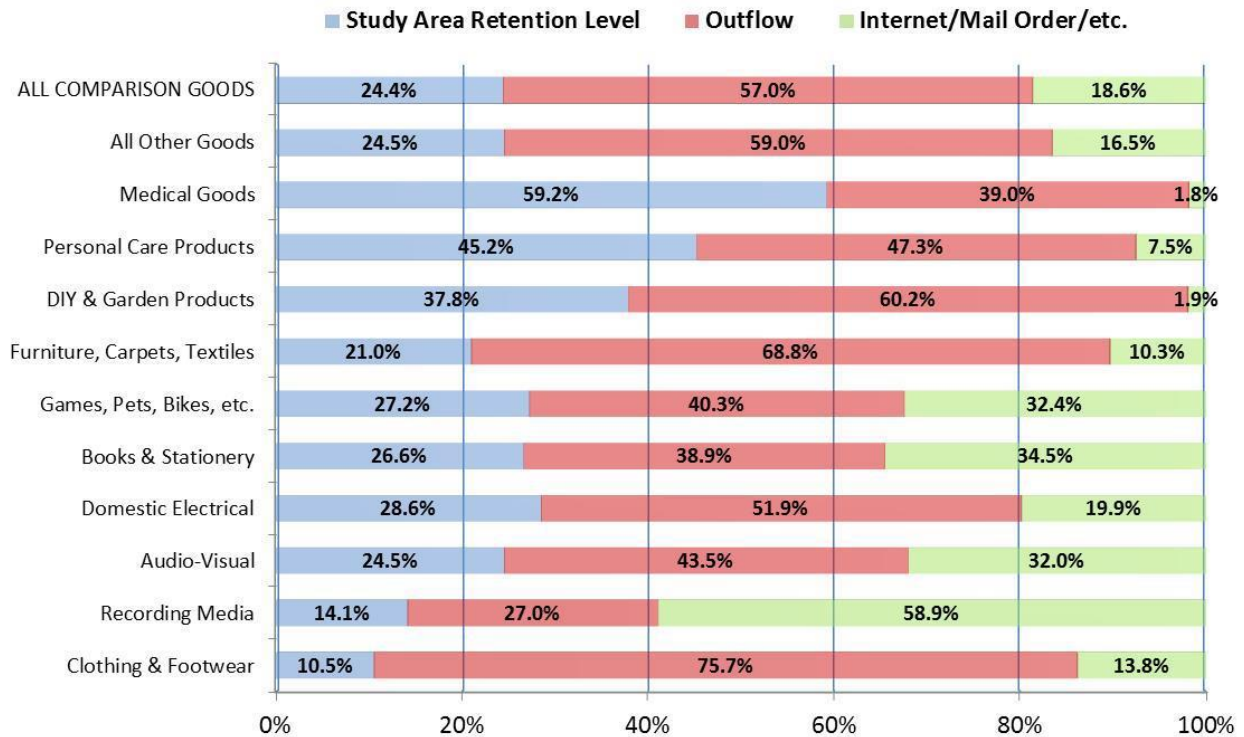
3.3.1 Economy

The Suffolk economy has achieved average growth of at least 2.5% per year since 2012 and is worth around £20bn per year. The Babergh & Mid Suffolk DC Joint Town Centres & Retail Study highlights a decline in shopping centre consumer patterns. A study undertaken in February 2015 has shown that Babergh District’s shopping centres and stores are achieving a retention level for all food shopping (across a defined study area) of 33.4%, compared to Mid Suffolk’s level of 19.0%.



The NPPF (paragraph 85) states that Local Plans should “define a network and hierarchy to town centres and promote their long-term vitality and viability- by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses... and reflects their distinctive characters”.

Figure 2: Study Area (Zones 1-11): Market Shares for Different Categories of Non-Food Retail



Source: Babergh and Mid Suffolk DC: Joint Town Centres & Retail Study, 2015

The Key Sectors & Market Towns Report identified an even distribution of employment across the two Districts, equating to around 64,000 full time jobs. The largest employment sector in Suffolk is manufacturing (17%), with health, retail, education and construction being dominant employment sectors in both Districts.

In Mid Suffolk and Babergh, 7,910 businesses have nine employees or less with 20.9% of the population in Mid Suffolk being self-employed and 12.1% in Babergh self-employed. Employment is forecast to decline in the agricultural sector by 2,300 jobs however growth opportunities exist through the rise of agri-tech, which is supported by the New Anglia LEP.

Figure 3: Ipswich and Waveney Economic Areas Spatial Context



Reproduced from the Ordnance Survey mapping with the permission of the Controller of Her Majesty's Stationery Office (c) Crown Copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Waveney District Council Licence No. 100042052, 2015

Source: Map produced by Waveney District Council for the Ipswich and Waveney Economic Areas Employment Land Needs Assessment (March 2016)

According to the Ipswich and Waveney Economic Areas Employment Land Needs Assessment, a higher level of self-containment indicates a greater degree in which an area functions economically. Table 1 below compares self-containment of 2011 Travel to Work Areas to Ipswich, providing an indication of how each area functions economically.

3.3.1.1 Employment

Table 2: Employment sectors within Suffolk

Employment Sector	Description
Energy	Suffolk already has over 8,000 energy related jobs and is ideally positioned to benefit from the shift to green energy sources
Manufacturing	Suffolk has over 15,000 jobs in advanced manufacturing with important concentrations around Lowestoft; St Edmundsbury and Babergh.
ICT	The ICT sector employs nearly 6,500 people in Suffolk. A major focus of this activity is Adastral Park, BT's global centre for innovation
Finance	Suffolk has significant advantages for the finance and insurance sector through relatively cheap property costs and wages, close proximity and easy access to London, good availability of related training and education
Agriculture	Suffolk is a rural county with a strong agricultural economic base linked to food production, processing and tourism. Food and drink, from "field to fork" is worth £400 million to the county.
Logistics	Suffolk's ports and logistics sector employs over 13,000 people and provides local firms with a distinct competitive advantage when exporting. Felixstowe is Britain's largest container port while Ipswich and Lowestoft are ideally located to service traffic to and from the industrial heartlands of Northern Europe.
Tourism	Tourism is worth over £1.75 billion annually to the Suffolk economy, providing nearly 30,000 jobs in 2,800 workplaces.
Creative and cultural industries	In 2011, the creative and cultural sector employed approximately 8,400 people in Suffolk.
Biotechnology	With over 50% of the UK's entire biotech industry located in the East of England, Suffolk is ideally placed to benefit from the growth widely projected for this sector.

Source: Suffolk Growth Strategy¹

¹ Suffolk Growth Strategy

Table 3: Comparison of Self-Containment of 2011 Travel to Work Areas (ONS)

2011 TTWA	Number of Employed Residents	Number of Workplace Jobs	% Self-Containment	
			Supply-side	Demand-side
Ipswich	179,660	176,254	85.9	87.6
Lowestoft	53,970	49,170	76.1	83.5
Bury St Edmunds	69,276	69,501	72.4	72.1
Cambridge	355,543	351,611	77.8	78.7
Chelmsford	239,361	214,797	67.8	75.5
Clacton	43,361	35,783	69.9	84.8
Colchester	105,272	98,996	72.3	76.9
Great Yarmouth	43,530	32,921	75.6	77.6
Norwich	220,540	221,571	86.8	86.4

Source: ONS 2015

The Ipswich Economic Area consists of the Borough of Ipswich and the districts of Babergh, Mid Suffolk and Suffolk Coastal with a population of approximately 445,000. From 2003-2013 there has been a growth in this area of 9% with most of this growth centred within the Borough of Ipswich².

Since 2009, the largest increase within Ipswich employment occurred in the professional business and employment services sector, with an increase of 13.4%. In Babergh, there has been a 6.8% increase in the total number of jobs from 2009-2013 (36,557 to 39,032). For Mid Suffolk, there has been a 4.1% increase in the number of jobs from 42,210 in 2009 to 43,954 in 2013, and in Suffolk Coastal the total number of jobs has increased by 4.2% during the same time period³. However, despite the growth in the total number of jobs, there are still barriers to growth within the Ipswich Economic Area⁴ which include:

- Shortage of suitable and affordable business premises, including start-up premise;
- Poor internet and broadband infrastructure;
- Attracting and retaining skilled workers to the area;
- Inefficiencies related to traffic congestion; and
- Lack of capital and financing to support growth ambitions.

² Ipswich and Waveney Economic Areas: Employment Land Needs Assessment; Final Report March 2016

³ Ipswich and Waveney Economic Areas: Employment Land Needs Assessment; Final Report March 2016

⁴ Ipswich and Waveney Economic Areas: Employment Land Needs Assessment; Final Report March 2016

Table 4: Summary of job growth for the Ipswich Economic Area (as implied by the East of England Forecasting Model (EEFM))

District	Number of Jobs		Change 2011-2031	
	2011	2031	No	%
Babergh	37,110	42,430	+5,320	14%
Ipswich	73,430	85,795	+12,365	17%
Mid Suffolk	43,625	49,345	+5,720	13%
Suffolk Coastal	57,665	67,090	+9,425	16%
Total	211,825	244,655	+32,830	16%

Source: Babergh District Council and Mid Suffolk District Council Local Investment Plan 2011 to 2016

Tables 3 and 4 highlight the strengths and weaknesses of the economy within the setting of Babergh and Mid Suffolk separately, although several similarities can be made in comparison.

Table 5: Strengths and weaknesses of the economy in Babergh

Strengths	Weaknesses
Within Haven Gateway Growth Point	No major road, rail or river links to Sudbury or Hadleigh
Proximity to good road and rail links to London and Cambridge, the east coast ports of Felixstowe and Harwich and Stansted airport	Shortage of affordable housing for lower paid employees
Strong and expanding local businesses in Sudbury and Hadleigh	Public transport limited for employee travel to work
Allocations in place for future business expansion in Sudbury, Sproughton, Brantham and Hadleigh	Poor internet access and unlikely to improve soon
Successful record of encouraging and supporting business growth in market towns and rural hinterland	Babergh is not identifiable as a known destination, partly because of its name and partly because of its geographical location between Ipswich, Colchester and Bury St Edmunds
Diverse industry base with a strong manufacturing presence	
Small/ medium business and enterprises able to adapt to changing economic environment	

Source: Babergh District Council and Mid Suffolk District Council Local Investment Plan 2011 to 2016



Table 6: Strengths and weaknesses of the economy in Mid Suffolk

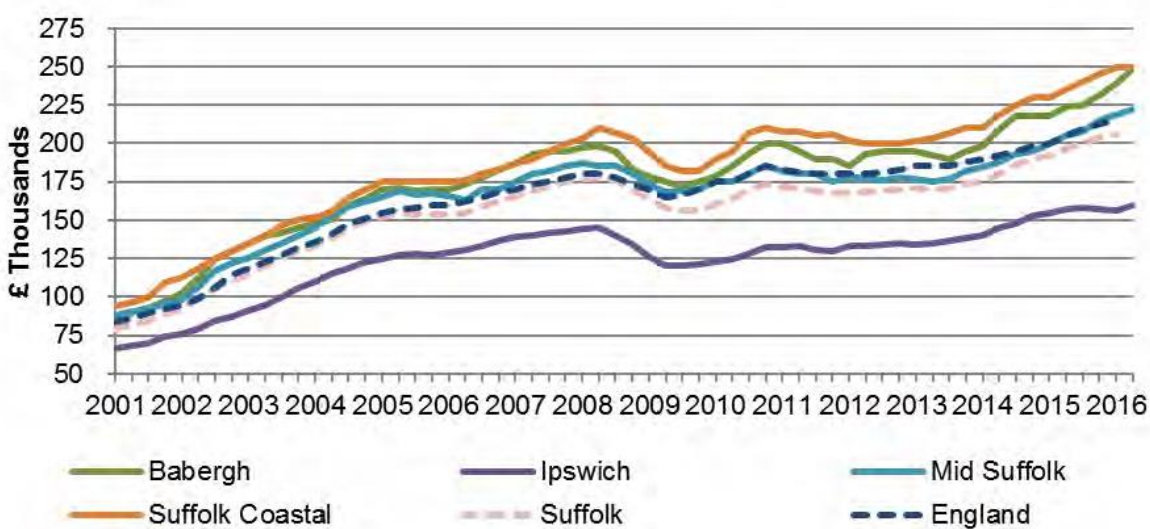
Strengths	Weaknesses
A14 runs east west through Mid Suffolk	Shortage of affordable homes and house prices high for lower paid workers
Close proximity to A12 and Felixstowe, Ipswich and Harwich ports	Poor public transport across much of the district leading to a reliance on private car ownership
High quality physical environment	Slow broadband speeds
Lower house and land prices than Suffolk and regional average	High level of outward commuting
Diverse and resilient employment base with strong manufacturing presence because of access to port for exports	Uneven distribution of services throughout the District

Source: Babergh District Council and Mid Suffolk District Council Local Investment Plan 2011 to 2016⁵

3.3.2 Housing

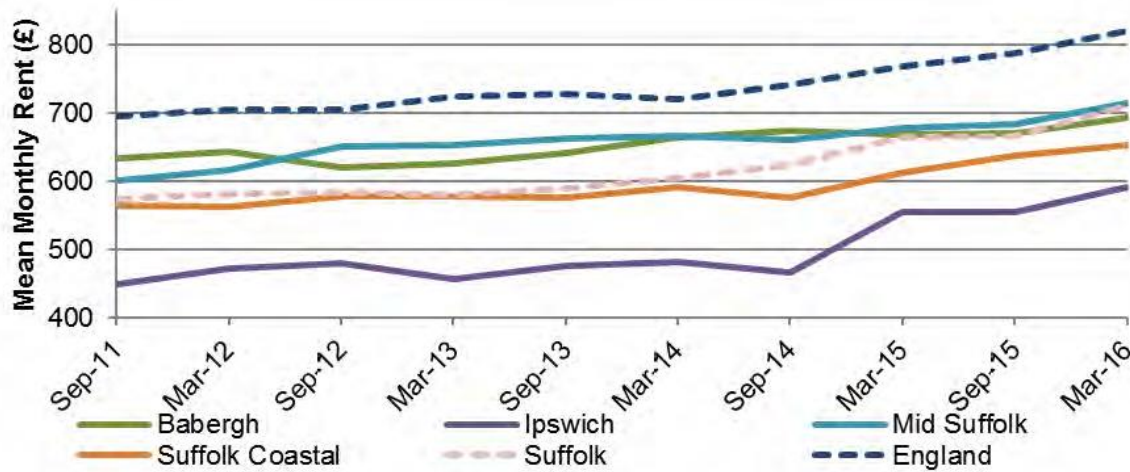
House prices in Mid Suffolk have always been close to the national median. The most recent data shows a median house price of £222,500 for Mid Suffolk, compared to the figure for England of £218,000. Figure 3 shows that house prices in Ipswich, Babergh and Suffolk Coastal have increased at a faster rate than the national average.

Figure 4: IHMA Median House Prices 2001-2016



⁵ Babergh District Council and Mid Suffolk District Council Local Investment Plan 2011 to 2016

Figure 5: IHMA mean monthly rent



Source: VOA

Babergh has had poor affordability, with house prices and house price growth higher than the county and national average. Babergh District has had 331 new dwellings built last year (as reported in the 2017-2018 Annual Monitoring Report⁶), which represents 102% of the annual target of 325 dwellings by the BDC Core Strategy. Mid Suffolk District has had 426 new dwellings built during the same time period which is 99% of the annual target set by the MSDC Core Strategy and Focused Review⁷.

There are approximately 10,687 properties in Suffolk that do not meet the Decent Home Standard under the Housing, Health and Safety rating because they are excessively cold⁸. This not only affects young children with asthma but the elderly, alongside the estimated 6,000 over 75's that need specialist housing⁹.

Table 7: Future Delivery by Number of Bedrooms and Tenure

Tenure	Bedroom Size (%)		
	1 & 2 Bed	3- Bed	4- Bed
Market Sector	55	30	15
Intermediate	60	40	-
Social Rented	50	35	15

Source: Babergh District Housing Needs survey: Final Report 2008

There is a requirement of 2,984 units for sheltered accommodation from older people currently living in

⁶ Babergh and Mid Suffolk Joint Annual Monitoring Report 2017-2018 (2018)

⁷ Babergh and Mid Suffolk Joint Annual Monitoring Report 2017-2018 (2018)

⁸ Suffolk Housing and Health Needs Assessment March 2018

⁹ Suffolk Housing and Health Needs Assessment March 2018



Babergh and those who in-migrate to be nearer to family. There has been an expressed need for Extra Care Accommodation of 509 units over the next three years¹⁰. There are high percentages of residents within Babergh and Mid Suffolk who live in rural areas, with 69% of Babergh's population and 75% of Mid Suffolk's population living in rural areas.

3.3.2.1 Homelessness

Homelessness in Babergh had doubled within the period 2010-2014 and there are issues with the housing composition and affordability in Babergh and Mid Suffolk¹¹. The housing stock in Babergh partially comprises of 9.2% Council dwellings and Mid Suffolk has 8.4% of its housing stock as Council dwellings. The majority of the homes across all tenures are large family units, with the owner occupied sector comprising of 72% of all homes¹². The close proximity to London and both Essex and Cambridgeshire has a direct effect on housing prices, as these neighbouring locations are more expensive. Due to the overall lower than average incomes, housing affordability is an issue. Babergh falls short of providing 369 affordable homes and Mid Suffolk falls short of 372, totalling an undersupply of 741 homes across both Districts¹³.

The Councils have a Joint Homelessness Reduction and Rough Sleeping Strategy (2019-2024) which seeks to ensure that homelessness is prevented and that services provide positive and planned interventions. Babergh and Mid Suffolk will focus on preventing and relieving homelessness through six key priorities over the next five years. These priorities and actions to achieve them are detailed within the Joint Homelessness Reduction Strategy 2019-2024. This strategy identified that there were 695 homeless applications taken, compared to 435 in Mid Suffolk (2013-2018). Of these, 405 households were accepted as homeless in Babergh and 275 in Mid Suffolk. The main reason for homelessness was a loss of private rented accommodation (in both Babergh and Mid Suffolk) with other factors including relatives being no longer able to accommodate, fleeing violence, relationship breakdowns. The most significant reason for priority needs were that households had dependent children.

The Joint Homelessness Reduction Strategy helps identify successes in tackling homelessness and also emerging trends, which are summarised as:

- Successfully prevented homelessness using the Councils Rent Deposit Scheme, which is used to try and assist clients in housing crisis access housing through the Private Rented Sector. Since 2013, Babergh has assisted 72 households and Mid Suffolk 32 to secure an Assured Shorthold Tenancy to prevent them from becoming homeless.
- Babergh have brought over 140 and Mid Suffolk have brought over 150 empty homes back into use.
- Babergh and Mid Suffolk have each built 27 new homes and have ambitious plans to build another 300 over the next three years.
- Babergh and Mid Suffolk have used Right to Buy Receipts to acquire additional properties, which have been made available for affordable rent. Babergh have acquired 32 and Mid Suffolk 43.
- Babergh and Mid Suffolk have each built 27 new homes and have ambitious plans to build another 300 over the next three years.

¹⁰ Babergh District Housing Needs Survey: Final Report 2008

¹¹ Babergh & Mid Suffolk Joint Local Plan: Sustainability Appraisal August 2017

¹² Babergh District Council and Mid Suffolk District Council Local Investment Plan 2011-2016

¹³ Babergh District Council and Mid Suffolk District Council Local Investment Plan 2011-2016

3.3.2.2 Gypsy, Traveller & Showpeople Accommodation

A Suffolk Gypsy & Traveller Accommodation Assessment was carried out in 2017 which showed that 1 pitch was required for Babergh and 42-43 pitches were required for Mid Suffolk, with 14-15 pitches remaining to secure¹⁴.

Babergh (1 caravan per 100,000 population) is very much below the England average of 39 caravans per 100,000 population. Mid Suffolk (109), are around the regional average of 81 caravans per 100,000 population¹⁵. Total provision of 196 pitches and plots across the study area including 70 privately owned pitches, 62 local authority pitches, 11 unauthorised pitches, 9 Travelling Showpeople plots, 3 potential pitches, and 2 pitches with temporary planning permission. There are 9 permanent Travelling Showpeople plots (7 in Mid Suffolk and 2 in Suffolk Coastal) with planning permission located on 5 yards, of which 8 plots are currently occupied.

Table 8: Summary of Accommodation needs in the Plan area (Babergh and Mid Suffolk) 2016-36

Period	G&T Pitches	TS Plots
Total 2016-21	32 (49) *	6 (7) *
Total 2021-26	12	1
Total 2026-31	14	1
Total 2031-36	15	1
Total 2015-2036	73 (90) *	9 (10) *

Source: ANA 2017 (* Need resulting from issues with supply)

Table 9: Gypsy and Traveller Population

Location	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Babergh	87,740	51	0.06%
Ipswich	133,384	149	0.11%
Mid Suffolk	96,731	76	0.08%
Suffolk Coastal	124,298	51	0.04%
Waveney	115,254	91	0.08%

¹⁴ Babergh District Council and Mid Suffolk District Council Local Investment Plan 2011-2016

¹⁵ Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment (ANA) for Babergh, Ipswich, Mid Suffolk, Suffolk Coastal and Waveney May 2017

Location	Population (no.)	G&T Pop (no.)	G&T Pop (%)
Total	557,407	418	0.07%

Source: Census 2011

Table 10: Gypsy and Traveller Population by Tenure

Location	Social Rented	Owned	Private Rented	Total
Babergh	6 (33%)	7 (39%)	5 (28%)	18
Ipswich	34 (68%)	8 (16%)	8 (16%)	50
Mid Suffolk	13 (36%)	17 (47%)	6 (17%)	36
Suffolk Coastal	9 (39%)	10 (43%)	4 (17%)	23
Waveney	9 (25%)	10 (28%)	17 (47%)	36
Total	71 (44%)	52 (32%)	40 (25%)	163

Source: Census 2011

3.3.3 Population and Society

Mid Suffolk covers 87,000 hectares and has a population of 92,000 residents living in 37,000 households within 122 parishes¹⁶. The Joint Strategic Plan 2016-2020 states that Babergh's population will grow by 10% to 96,400 and that of Mid Suffolk by 20% to 116,700. Based on these forecast figures, 12,927 people are expected to be aged over 80 in Babergh (13.4%) by 2035 and 13,350 aged over 80 in Mid Suffolk (11.4%)¹⁷. This poses several challenges to how services can be adapted to meet the needs of the ageing population within their communities.

Suffolk has a low wage economy with median weekly gross earnings for full-time working (based on 2015 figures) being £460 for Babergh and £465 for Mid Suffolk, compared to the £532.40 national average¹⁸. There is a relative lack of higher skills within Suffolk; in Babergh 28.7% of residents were qualified at NVQ level 4 and above (in 2014) and in Mid Suffolk, this figure was at 31.9% (2014) which is comparatively lower than the national average of 35.7%¹⁹.

The table below shows the estimated total population nationally, regionally and by district as according to the Hidden Needs Report for the Suffolk Community Foundation²⁰.

¹⁶ Transforming Suffolk; Suffolk's Community Strategy 2008-2028 – Suffolk Strategic Partnership 2008

¹⁷ Babergh District Council & Mid Suffolk District Council; Joint Strategic Plan System 2016-2020

¹⁸ Babergh District Council & Mid Suffolk District Council; Joint Strategic Plan System 2016-2020

¹⁹ Babergh District Council & Mid Suffolk District Council; Joint Strategic Plan System 2016-2020

²⁰ Hidden Needs: Hidden Needs in Suffolk Five Years on (2011-2016): A report to Suffolk Community Foundation

Table 11: Estimated Total Population Nationally, Regionally and by District

England	54,316,618
East of England	6,018,383
Suffolk	738,512
Babergh	88,845 (12.0%)
Forest Heath	62,812 (8.5%)
Ipswich	134,966 (18.3%)
Mid Suffolk	99,121 (13.4%)
St Edmundsbury	112,073 (15.2%)
Suffolk Coastal	124,776 (16.9%)
Waveney	115,919 (15.7%)

Source: Hidden Needs: Hidden Needs in Suffolk Five Years On (2011-2016): A report to Suffolk Community Foundation

Table 12: Population Growth by IEA Local Authority 2001-2016

Location	2001	2016	% Change 2001-2016
Babergh	83,500	89,200	+6.8%
Ipswich	117,200	136,500	+16.5%
Mid Suffolk	87,000	100,300	+15.3%
Suffolk Coastal	115,200	125,000	+8.5%
Ipswich Economic Area	402,900	451,000	+11.9%
New Anglia LEP	1,468,500	1,638,100	+11.5%
Great Britain	57,424,200	63,785,900	+11.1%

Source: ONS midyear population estimates

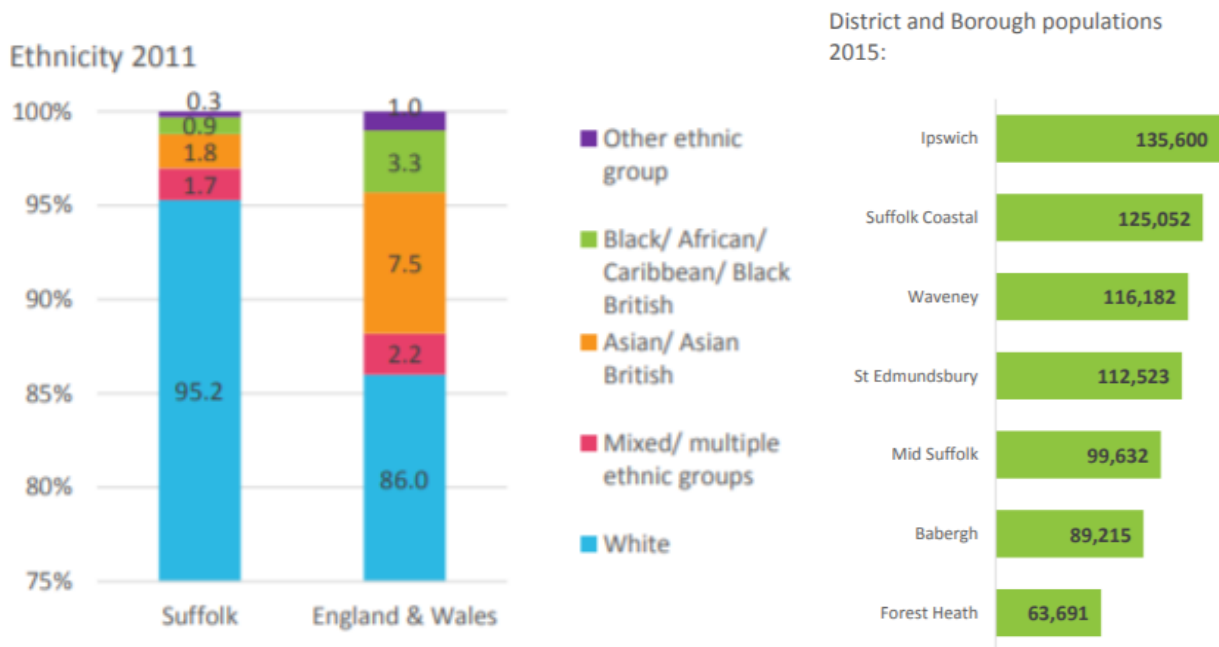


Table 13: Suffolk Population Summary 2017

Population Group	Number
Total Population	741,895
Male population	366,043 (49.3%)
Female population	375,852 (50.7%)

Source: Healthy Suffolk 2017

Figure 6: Ethnicity Composition in Suffolk and District and Borough Population 2015



Source: Healthy Suffolk 2017

There have been a number of policies set out within local strategies such as Transforming Suffolk – Suffolk’s Community Strategy (2008 – 2029, Suffolk Strategic Partnership) that outline the need for improvements to the local landscape in order to serve the community. For example, in the aforementioned Strategy, a key theme was Safe, Healthy and Inclusive Communities²¹. The Babergh District Council Strategic Plan (2008-2018²²) outlines the outcomes of linking good urban and environmental design to healthy communities as follows:

- New housing developments are supported by adequate infrastructure improvements;
- The right balance between protecting the natural environment and supporting development

²¹ Open Space, Sport and Recreation Strategy September 2010, Babergh District Council

²² Babergh District Council Strategic Plan 2008-2018

opportunities for the area and its people;

- Babergh's environment is clean, with little environmental vandalism e.g. fly tipping and this is recognised by residents;
- A more active population with healthier lifestyles;
- Active local villages and communities; and
- Public services appropriately reflect the needs, aspirations and choices of individuals from different groups, such as older people, in their design, resourcing and delivery.

With an increasing population, the ONS interim household projections for 2021 (published April 2013) shows that the average household size in Mid Suffolk will be 2.28 persons. The tables below outline the space standards for outdoor sports facilities how many sports pitches per person are required.

Table 14: Space Standards for Outdoor Sports Facilities

Category	M2 per person
Outdoor pitches	16
Outdoor other sports facilities	1.6
Synthetic turf pitch	0.18

Source: Mid Suffolk District Council Infrastructure SPD, Table 7

Table 15: Space needs for additional population – outdoor sports facilities

Space provision (m2)	Needham Market	Eye	Key Service Centres	Primary Villages	Ipswich Policy Area
Dwellings	470	230	750	300	170
Outdoor pitches	17,146	8,390	27,360	10,944	6,202
Outdoor other sports facilities	1,715	839	2,736	1,094	620
Synthetic turf pitch	193	94	308	123	70

Source: Mid Suffolk District Council Infrastructure SPD, Table 7

Suffolk is relatively large geographically and thus, the general population fluctuates greatly in terms of levels of comparison. The key issues for Suffolk, as highlighted in the Joint Strategic Needs Assessment²³ are as

²³ A Joint Health and Wellbeing Strategy for Suffolk: A Ten Year Strategy 2012-2022: Early Priorities for Review 2015 (May 2013)

follows:

- 1 in 6 children live in relative poverty;
- Educational attainment is below national rates;
- Suffolk has a low wage economy although employment rates are higher than average;
- General affluence masks pockets of deprivation and inequality gaps;
- The comparative risk of dying prematurely has increased if you are from deprived areas of Suffolk; and
- Suffolk has an ageing population.
- 14% of children are living in low income families (as of 2016), 10% of households are experiencing fuel poverty and 2 homeless and in priority need per 1,000 households (2017-2018).

Within Suffolk, only 33% of children eligible for free school meals attained five good GCSEs compared with 70% of pupils overall. The tables below highlight the level of achievement of pupils in comparison with their eligibility for free school meals.

Table 16: Percentage of Pupils Achieving 5+ A* -C Grades in 2014/2015

Percentage achieving 5+ A* -C grades	England	East	Suffolk
All pupils	67%	67%	63%
Eligible for free meals	42%	38%	33%
All other pupils	70%	70%	67%

Source: Hidden Needs: Hidden Needs in Suffolk Five Years On (2011-2016)

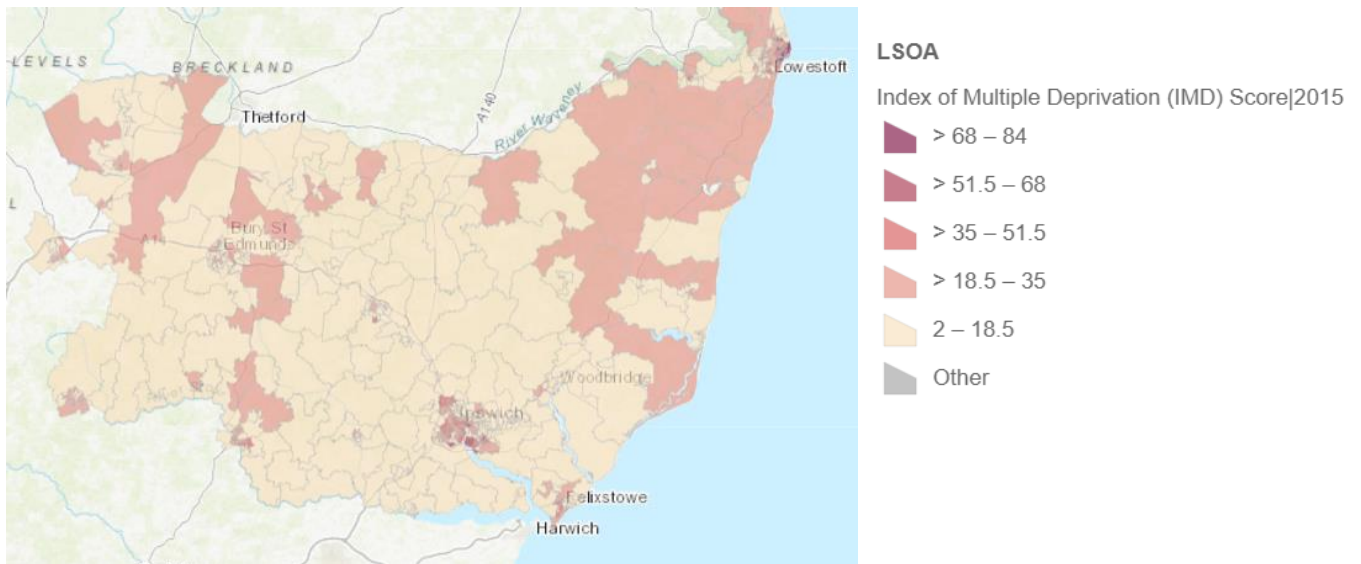
Table 17: Revised GCSE and equivalent results in Suffolk: 2013 to 2014

Area	Number of eligible pupils*	5+ A* - C grades	5+ A* - C grades inc. English and mathematics GCSEs	5+ A* - G grades	5+ A* - G grades inc. English and mathematics GCSEs	A* - C in English and mathematics GCSEs
England	556,002	65.8%	56.8%	93.5%	91.2%	59.1%
East	63,701	65.5%	57.2%	93.8%	92.0%	59.7%
Suffolk						

Area	Number of eligible pupils*	5+ A* - C grades	5+ A* - C grades inc. English and mathematics GCSEs	5+ A* - G grades	5+ A* - G grades inc. English and mathematics GCSEs	A* - C in English and mathematics GCSEs
Babergh	847	66.4%	55.0%	96.1%	94.7%	56.1%
Forest Heath	357	53.8%	43.4%	95.2%	90.5%	44.8%
Ipswich	1,458	53.9%	43.7%	89.5%	87.1%	45.3%
Mid Suffolk	1,229	68.8%	60.9%	95.4%	94.6%	64.0%
St Edmundsbury	1,123	69.0%	57.7%	93.8%	92.1%	58.5%
Suffolk Coastal	1,181	67.2%	56.1%	96.2%	92.0%	57.7%
Waveney	1,243	51.2%	42.2%	89.9%	86.8%	45.4%

Source: Hidden Needs: Hidden Needs in Suffolk Five Years On (2011-2016)

Figure 7: Indices of Multiple Deprivation in Suffolk 2015



Source: Suffolk Observatory 2018



3.3.4 Health and Wellbeing

People in Suffolk generally live longer than the national average, with women reaching 82.1 years (English average 81.1) and men reaching 78.4 years (English average 76.6 years). The NHS Strategic Plan outlines that Suffolk has a lower rate of homelessness, teenage pregnancy and crime as compared to the national average. However, hospital admissions for hip fractures (for residents over 65) and road accidents are similar to the rest of England. Approximately 67% of residents in both districts are classified as obese or overweight with around 12% who smoke. Alcohol-related hospital admissions are rising annually, with a third of older people developing drinking problems.

Workforce skills represents another key challenge for health and care related growth across Babergh and Mid Suffolk over the coming years, with the Clinical Commissioning Group recognising the need to develop the skills of the current workforce, ensuring that they are capable of responding to changing patient needs. Whilst deprivation rankings are relatively low across Babergh and Mid Suffolk Districts there are pockets of comparatively greater levels in Great Cornard North, Sudbury East and Sudbury South. These pockets of deprivation are areas where the general population's health tends to suffer most. Life expectancy can vary greatly depending on where a person lives, for example the average life expectancy in Bury St. Edmunds is 87.9 years, 12 years longer for those who live in the more deprived ward of Kirkley, Lowestoft, which has an average life expectancy of 75.9 years. Due to Suffolk being predominately affluent- despite the pockets of deprivation- the County fares well on measures of health deprivation, with over half of neighbourhoods ranked in the least deprived 40 percent.

The NHS Strategic Plan had forecast (based on figures 2008-2013) that the number of people:

- With long-term health conditions caused by stroke will increase by 23%;
- With long-term conditions caused by heart attack will increase by 24%;
- Suffering from dementia will increase by 17.5%;
- With type 1 or type 2 diabetes will increase by 31.5%;
- With depression will increase by 23%;
- Visiting A&E after having a fall will increase by 20%;
- With a limiting long-term illness will increase by 22%; and
- Who are classed as obese will increase by 22.5%.

With a growing population across all of Suffolk, especially in Babergh and Mid Suffolk, there has been an increase in need for Advance Care Planning- care plans aimed at people reaching end of life. This is a result of an ageing population which is being addressed in the Joint Local Plan. The 2016 Dying Matters survey found that:

- 73% of respondents believed that talking about dying was taboo;
- 78% thought that if we were more comfortable, it would be easier to have end of life wishes met;
- 1 in 3 people are not comfortable talking about dying with friends and family;
- 30% had let someone know their funeral wishes; and
- 7% had written down their end of life wishes or preferences about their funeral care should they be unable to make those decisions by themselves.



Taking a proactive approach to end of life care will allow for both young people and the elderly to take steps in living a healthier life, discussing their health needs and incorporating them within their care plan. Programmes such as St Nicholas Hospice Care, Stepping Forward (a walking group for those who are bereaved), encourages people to step outside and meet others in a social setting, potentially leading to better mental and physical health .

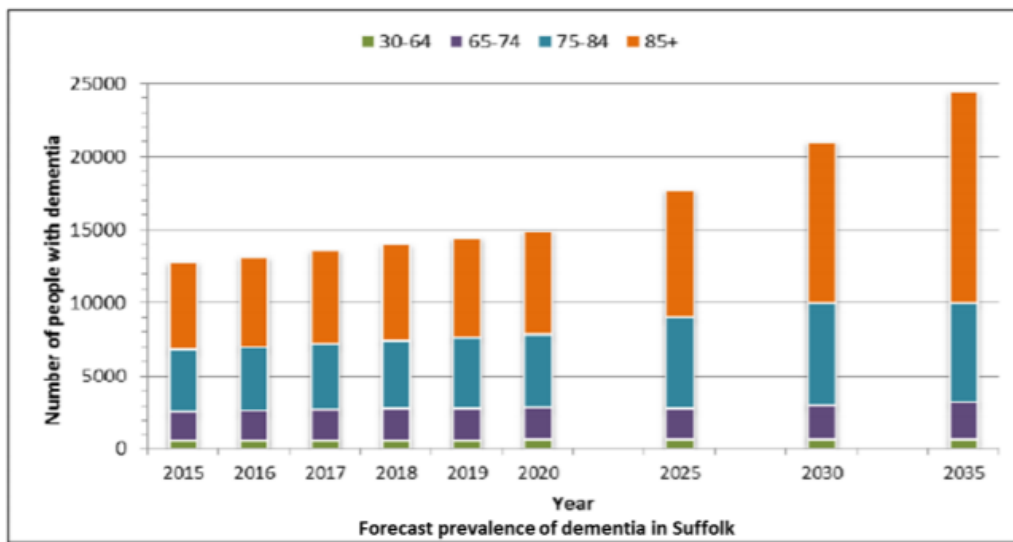
The Suffolk Housing and Health Needs Assessment outlines that the number of people with a learning disability is forecast to increase by 9% by 2035, meaning that demand for housing which meets specialist needs is likely to increase.

Those who live within 500 metres of accessible green space are 24% more likely to meet the recommended levels of physical exercise, leading to savings of £2 billion each year to the treatment of heart diseases, cancers and strokes (related to inactivity).

The following list is a rundown of statistics for Suffolk:

- In June 2018 over 600 people in Suffolk were alive thanks to organ donation
- 295,056 people are on the NHS organ donor register
- 16.1% of young people are affected by poor emotional and mental health
- 8.7% of young people live inactive lifestyles
- The number of people suffering with Dementia is expected to increase in the coming years

Figure 8: Forecast of Dementia in Suffolk



Source: Suffolk Better Care Fund Plan 2017-19²⁴

²⁴ A Vision for Health and Social Care Services in Suffolk; Suffolk Better Care Fund Plan 2017-29 September 2017



3.3.5 Transport and Connectivity

Both Babergh and Mid Suffolk benefit from some form of public transport provision, however due to the Districts being majorly rural, a lot of these areas suffer from poor public transport links. Public consultations have identified a series of issues and priorities within Mid Suffolk as outlined below:

- Concerns about traffic generated from new developments;
- Lack of investment in infrastructure;
- Lack of pavements in several villages;
- Public transport is limited in rural areas;
- Speeding traffic;
- The need for more cycle routes (especially in Stowmarket);
- Traffic generation reaching highway capacity on A14 road;
- Important links to nearby centres e.g. Ipswich, Bury, Diss, Harleston; and
- Economic importance to the business community of maintaining and improving infrastructure.

It can be seen that development opportunities increase as transport needs are met; aligning public transport timetables and providing infrastructure for cycling allows for an integrated approach to transport provisions that encourage business into the area. Areas that are secure in their transport provisions are generally more appealing in comparison to areas that are hard to reach and expensive to travel to. According to the Mid Suffolk District Council Infrastructure Delivery Plan (2014), funding for transport provision was to come through a combination of Local Transport Plan (LTP) funding and developer contributions.

Figure 9: Town Strategy Locations



Source: Suffolk Local Transport Plan 2011-2031

To mitigate the loss of rural services, the Suffolk Local Transport Plan have been introducing demand responsive transport services. Standard timetabled services have been replaced with smaller vehicles taking people on request to another bus or a rail service, or direct to a destination. Severance issues exist within Babergh due to the proximity of heavily trafficked roads to local communities, with the A12, A1071 and A137 particularly impacting on communities by the difficulty with which they can be crossed to reach services. When the A12 is closed this also creates further issues with vehicles using inappropriate roads to negotiate around incidents, putting greater volumes of traffic through local communities.

Table 18: Capital Maintenance Programme for 2011 / 2012

	£'000
A Roads	4,500
Bridges	1,650
Street lighting & signals	500
Pavements & Drainage	1,000
Other roads	10,442
Rights of way	150
Renewals Programme	1,100
Structural maintenance	3,050
Total	22,392

Source: Suffolk Local Transport Plan 2011-2031²⁵

Table 19: Key Transport issues for Babergh

Key transport issues for Babergh	Sudbury bus station development and surrounding town centre environment
	Sudbury bypass
	Sudbury town centre traffic management and Cross Street Air Quality Management Area
	Sudbury station
	Residents parking, long stay parking, lorry parking
	Hadleigh – local service, dial a ride
	Hadleigh Benton Street
	Lorry parking within the district
	A12, A14 and Copdock improvement
	Access to education (e.g. Suffolk One)
	Linking new strategic development to town centres
	Felixstowe to Nuneaton rail improvements to allow freight modal shift
	Speed and management of A134

Source Suffolk Local Transport Plan 2011-2031²⁶

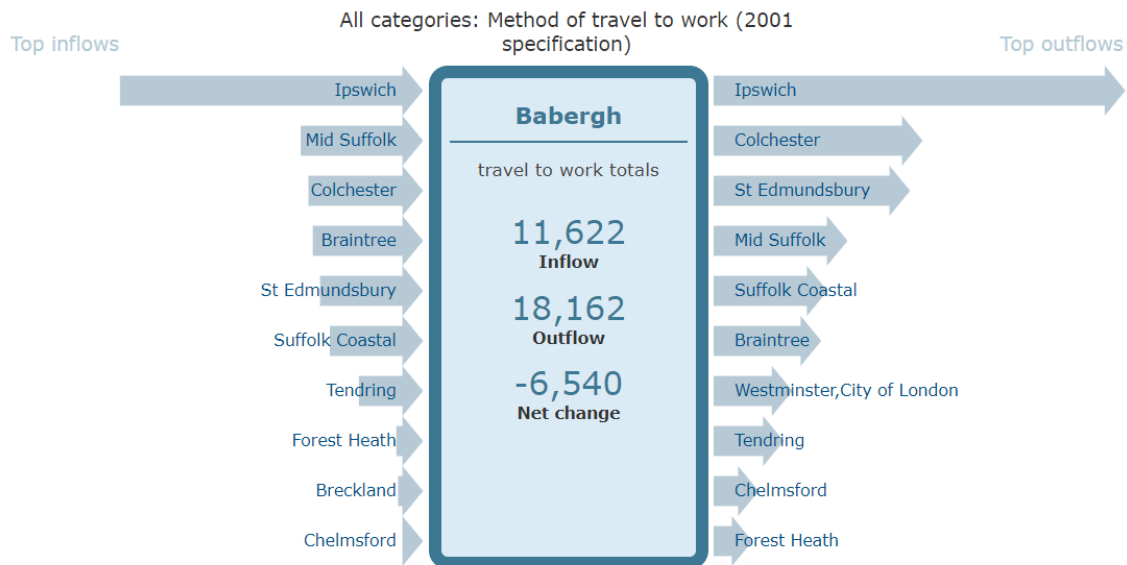
²⁵ Suffolk Local Transport Plan 2011-2031; Part 2: Implementation Plan



Table 20: Key Transport Issues for Mid Suffolk

Key Transport issues for Mid Suffolk	Town based bus services in Stowmarket
	Stowmarket transport interchange
	Tackling congestion in Stowmarket
	Cycle network
	Rural bus provision
	Rural footpaths
	Local access to key services
	Lorry management

Source: Suffolk Local Transport Plan 2011-2031²⁷

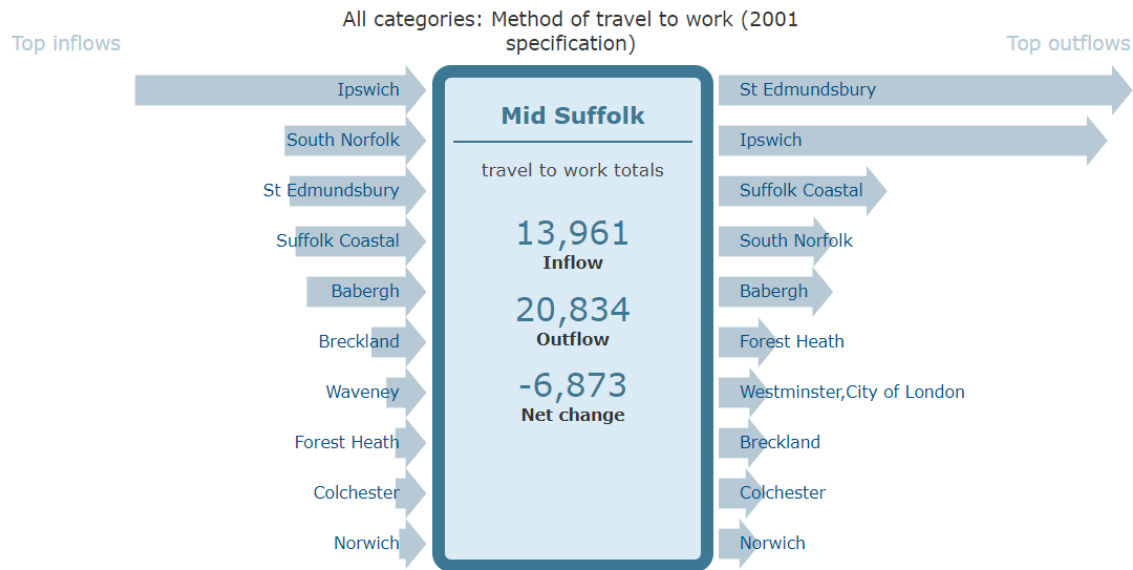


Commuting totals (all categories: method of travel to work (2001 specification)) for Babergh:

- Inflow: **11,622** person(s) commute into Babergh from other local authorities in the UK.
- Outflow: **18,162** person(s) commute out of Babergh to other local authorities in the UK or abroad.
- Net change: Overall, commuting results in a population decrease of **6,540** in Babergh.

²⁶ Suffolk Local Transport Plan 2011-2031; Part 1 Transport Strategy

²⁷ Suffolk Local Transport Plan 2011-2031; Part 1 Transport Strategy



Commuting totals (all categories: method of travel to work (2001 specification)) for Mid Suffolk:

- Inflow: **13,961** person(s) commute into Mid Suffolk from other local authorities in the UK.
- Outflow: **20,834** person(s) commute out of Mid Suffolk to other local authorities in the UK or abroad.
- Net change: Overall, commuting results in a population decrease of **6,873** in Mid Suffolk.

Source: ONS, Census WU03UK - Location of usual residence and place of work by method of travel to work

3.3.6 Cultural Heritage

Babergh and Mid Suffolk are host to a number of Heritage assets; this includes roughly 6,500 listed buildings across both of the Districts, the table below summaries the assets.

Table 21: Heritage Assets within both Districts

	Listed Buildings	Conservation Areas	Scheduled Ancient Monuments	Historic Parks & Gardens
Babergh	Approx. 3,000	29	34	5
Mid Suffolk	Approx. 3,500	31	35	2

Source: Historic England, 2019

Both Districts have an exceedingly high quality of historic environment, containing; areas, settlements and buildings of national significance. All of which play a vital role to the characters of both Babergh and Mid Suffolk and also on influencing the future development of both Districts. There are currently 29 Conservation Areas within the Babergh District and 31 Conservation Areas within Mid Suffolk.

Despite the Historic Environment being paramount to the character of both Districts, it is also extremely sensitive to change, and can be severely affected by inappropriate development.



The Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils assessed the 42 settlements which have been identified as potential areas of residential expansion. The assessment identified eight settlements with cumulatively high value. These being: Boxford, Debenham, East Bergholt, Eye, Hoxne, Lavenham, Long Melford and Nayland. The majority of these settlements are well preserved, and as such are of both high value and susceptible to harm from unsuitable housing. Specifically Debenham, Hoxne, Long Melford and Nayland are all of particular vulnerability.

Ipswich was a medieval settlement located on the north side of the River Gipping, which grew to be an important centre for trade and manufacturing- the port facilitated early international trade. The relevance of the town of Ipswich is that it borders the Plan area and exists as the largest settlement in Suffolk. It can be expected therefore that Ipswich would be a focus of growth, and that development would need to respect its historical context where relevant.

3.3.7 Biodiversity and Nature Conservation

To protect and enhance Babergh and Mid Suffolk's landscapes, designating sites that are held to high value and importance is paramount. This helps support tourism and the economy alongside maintaining the quality of life for communities that live in rural areas. In Babergh, there are two Areas of Outstanding Natural Beauty (AONB) alongside Sites of Special Scientific Interest (SSSI), Ramsar and Special Protection Areas (SPA). Two Regionally Important Geological/ Geomorphological Sites (RIGS) are identified in Mid Suffolk.

By 2020, at least 50% of Suffolk's SSSI's will be in favourable condition which outlines the increased need for enforcement agencies taking "appropriate action against perpetrators of crimes against wildlife". There are currently 36 Local Nature Reserves (LNRs) in Suffolk which both allow for people to relax and exercise in, whilst simultaneously supporting ecological networks.

Figure 5 Mid Suffolk Districts Environmental Characteristics

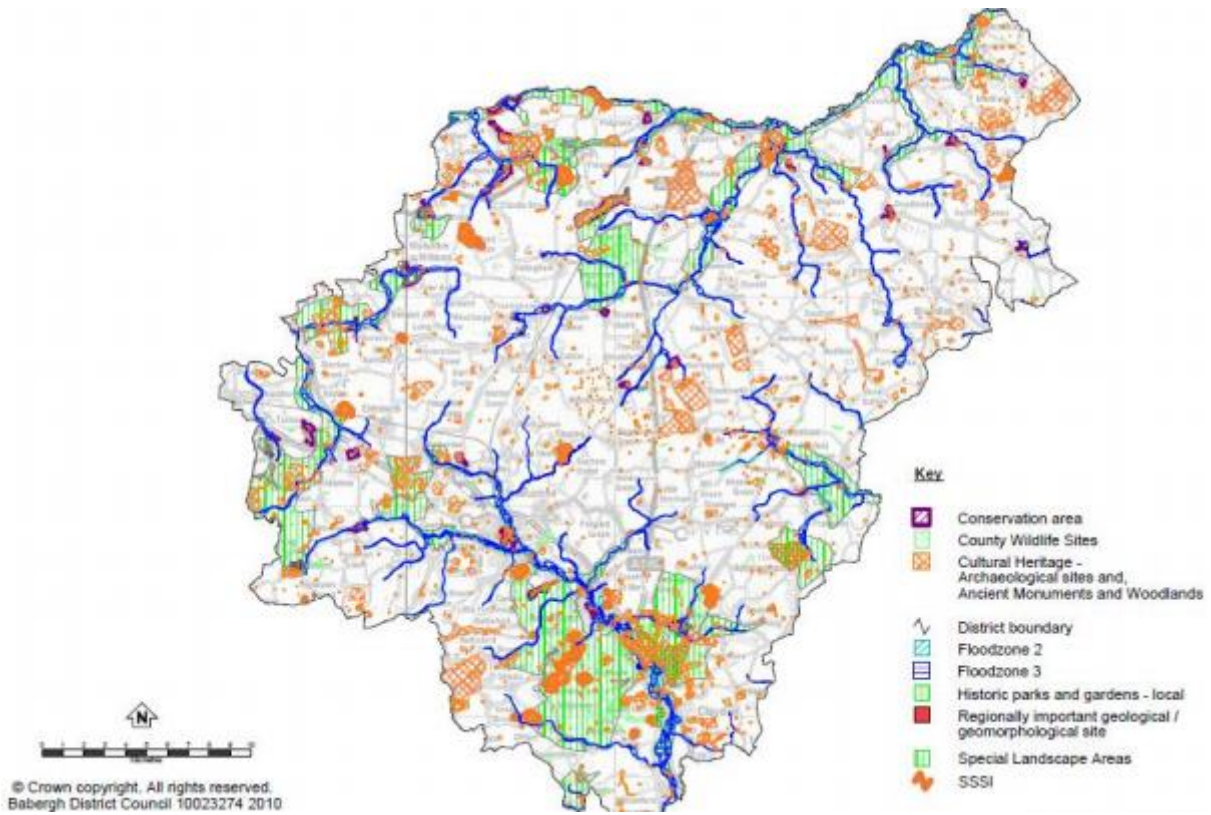
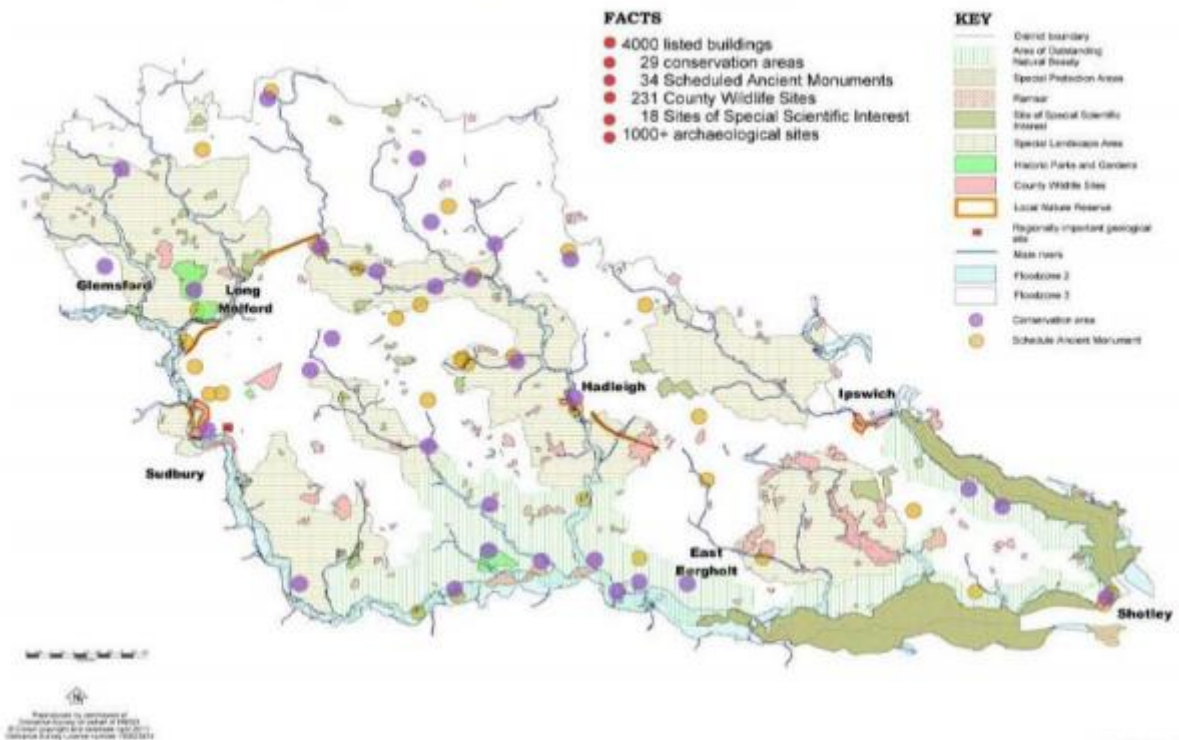


Figure 6 Babergh Districts Environmental Characteristics

Environment Map





3.3.8 Landscapes

Large parts of Suffolk are protected for their wildlife or landscape value. Approximately 4% of this land area is designated as an SSSI and has two Areas of Outstanding Natural Beauty; the Suffolk Coast and Heaths and the Dedham Vale, both combined covering an area of 44,000ha (12%) of the land area²⁸. Proximity of homes to green space can add £2000 to the capital value of houses in England²⁹, highlighting the economic importance of incorporating green spaces within developments.

Babergh's Landscape Character consists of a rolling and undulating landscape which was caused by regular incisions by both the River Gipping and River Stour. The distinctiveness of the 'Gipping Divide' has recently been acknowledged for its role as a significant historic cultural boundary.

Mid Suffolk's Landscape Character is typically gently rolling plateau of heavy clay soils. Both the Waveney and Gipping Valleys are locally distinctive with the District.

Land contamination surveys and checks must be undertaken to ensure there is no threat to residents, the environment or wildlife in the affected area. To determine whether there is a significant pollutant linkage, there must be a concentration on the Source i.e. the "physical presence of a contaminant in, on or under the ground, in quantities large enough to be a potential hazard" and any pathways i.e. "a means by which the source can come into contact with something or someone that could be harmed"³⁰.

3.3.9 Water Environment

The Environment Agency (EA) is the organisation with overall responsibility for strategic flood risk management in England. In the United Kingdom the EA are responsible for the management of flooding from designated main river watercourses and the sea, as well as holding regulatory powers of enforcement over tidal and main river flood defences. The Water Framework Directive is an EU directive, designed to preserve, restore and improve the water environment. The Environment Agency leads and promotes its goals and actions. Due to Babergh and Mid Suffolk having numerous rivers run through their areas e.g. the River Gipping and River Brett, there is a need to ensure that not only the rivers are protected but that all water sources including groundwater are too. Natural England is committed to investing in protected area measures. This focuses on "safeguarding and where necessary improving the condition of Natura 2000 sites using measures such as river restoration, lake restoration, diffuse pollution, management of freshwater invasive species and habitat restoration on wetland sites".

All of the River Orwell within Babergh is tidal. The River Stour is tidal between the mouth at Shotley Gate and Catterwade Sluice. Other water sources include tributaries of the Stour including the River Brett, River Box, River Glem and Chad Brook and Belstead Brook. Alton Water reservoir covers approximately 400 acres and provides water for 200,000 Anglian Water customers. The presence of several bodies of water creates a risk of flooding and surface water flooding for sites within Babergh and Mid Suffolk. Along the river valleys there are areas of functional flood plain which can be incorporated into Green Infrastructure developments. For example, the meadow in Bures is used for informal recreation.

²⁸ Joint Municipal Waste Management Strategy for Suffolk 2003-2020 (Adopted version 2003, Addendum 2008)

²⁹ Suffolk's Nature Strategy (Wild Anglia 2014)

³⁰ Babergh District Council Contaminated Land Strategy (Adopted April 2009)



3.3.10 Climate and Energy

The Mid Suffolk District Council Infrastructure Delivery Plan has outlined the needs to control urban run-off to rivers and their tributaries, in particular the River Gipping. The implementation of Sustainable Urban Drainage Systems (SuDS) to provide improved water quality, amenity and ecological benefits will supplement the flood risk management benefits. There is a need to ensure that:

- New development does not cause a deterioration in Water Framework Directive (WFD) status to any waterbody;
- A package of mitigation works to enhance the WFD status of relevant waterbodies are undertaken; and
- Development does not prevent the future achievement of Good Ecological Status/ Potential in any waterbody.

In Suffolk, climate change poses particular serious risks as the county is characterised by its long, low-lying coastline. The ageing population of Suffolk, alongside children, will be particularly at risk from climate change as rising temperatures in the summer coupled with decreasing temperatures during winter months will become increasingly detrimental. “In Suffolk, domestic carbon dioxide emissions make up the majority of the county’s emission. Transport was shown to be the second largest producer of emissions, closely followed by industry and commerce”. The nature of Suffolk being mainly rural explains the high levels of dependence on the private car, as many villages and neighbourhoods are served by infrequent public transport or are in areas where public transport and alternatives are not available. Each District is served by water companies that must provide a drought plan that mitigates and reduces any risk associated with droughts. Babergh falls under the Anglian Water region and Mid Suffolk under the Essex and Suffolk Water region; both areas are prone to drought. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harms associated with droughts, ranging from small-scale water inefficiencies to large-scale ones.

A ministerial statement issued on 18th December 2014, described the expectation that local planning policies and decisions on planning applications of 10 homes or more or equivalent non-residential or mixed development should ensure sustainable drainage systems are put in place unless demonstrated to be inappropriate.

Table 22: Main River Map of Suffolk



Source: Suffolk's Flood Risk Management Strategy

The annual review of activities for 2017/18 outline that:

- Through the Solar Together Suffolk scheme Suffolk has achieved a 20% discount on market price, attracting 2,900 registrants
- Business Energy Efficiency (BEE) Anglia have awarded more than £538k in grant funding for energy efficiency projects (totalling almost £1.8m) – the project has reviewed 715 organisations and identified cost savings of £4.2m
- There have been CO2 savings of over 30,000 tonnes
- SABRE offered 120 small to medium businesses impartial renewable energy advice
- Domestic Energy Efficiency Suffolk Energy Action have installed efficiency measures in over 1,000 Suffolk home.
- 500 Carbon Charters were awarded to businesses that are doing their bit towards Creating the Greenest County



3.3.11 Air

Due to Babergh and Mid Suffolk being predominately rural areas with few urban centres, air and noise quality is thought to remain quite high due to the lack of car traffic and pollution that accompanies it, such as the case in larger metropolitan areas. However, the 2018 Air Quality Annual Status Report (ASR) (published October 2018) showed nitrogen dioxide concentrations at or above AQO levels at two locations in Sudbury which will be subject to additional monitoring. Despite both Districts being largely rural, pockets of diminishing air quality can be found.

The 2018 Air Quality Annual Status Report (ASR) identified that there were annual mean NO₂ concentrations over the last five years at four monitoring locations that exceeded the Objective in 2017. These locations are all within an AQMA at Cross Street, Sudbury.

Results at these four locations have not varied much over the last five years. At one of these locations there has been a slight reduction in Nitrogen dioxide concentration over the past 5 years, at one location there has been a slight increase, and at the other two locations the concentrations have been stable. There is only one other monitoring location that has shown exceedances of the Objective during the past 5 years, but it did not in 2017.

The annual mean NO₂ concentration over the last five years at monitoring locations within the Babergh district did not exceed the Objective in 2017. At most locations there has been a reduction in Nitrogen dioxide concentration over the past 5 years. There has been a gradual reduction in Nitrogen dioxide concentration over the past 5 years in regard to annual mean NO₂ concentration over the last five years at monitoring locations within Mid Suffolk district

Dust emissions from either demolition or construction of a new development can have a significant impact on the quality of air, especially from larger developments that take many years to complete. Developments within Ipswich are likely to cause increased pollutants from construction, alongside high levels of traffic along the A14 and other main roads. Babergh and Mid Suffolk's air quality is directly impacted by settlements and counties surrounding them. Generally, emissions from odours from sewage treatment plants, composting facilities or poultry and pig farms can also be detrimental to air quality, especially in rural areas. Table 23 highlights how development can mitigate against air and noise pollution both during construction and after the development has been completed. A list in ways to offset the harms of air and noise pollution during the construction phase is as follows:

- Barriers
- No bonfires
- No idling vehicles or vehicle wash
- Skip covers/ minimise drop heights
- Wrap buildings to be demolished
- Use of water as a dust suppressant
- Ensure concrete crusher has permit to operate
- Sustainable water use should be considered

- Considerate Contractor Scheme

Table 23: Examples of Redesign, Mitigation and Offsetting in the demolition/construction phase

Redesign, Mitigation and Offsetting Options for the Demotion/ Construction Phase of Development	Redesign of Scheme	Mitigation	Offsetting
	Increase distance between the sensitive development and the pollution source	Mechanical ventilation in areas of poor air quality with air taken from a (proven) area of good air quality. This is not a desirable option and should be considered as a last resort. If this is to be progressed the following must be considered:	Develop a Travel Plan
	Identify the areas of poorest air quality within the site and place least sensitive use in these areas (e.g. bin storage areas)	Air must be taken from an area of proven good air quality	Contribution towards improvements in public transport, pedestrian and cycle routes
	Place non-habitable rooms nearest to roadside or pollution source e.g. stairwells, bathrooms, kitchens	Measures must be put in place to protect the intake of air becoming polluted at a later date (e.g. if an emission source was placed beside the intake)	Secure cycle parking
	Place balconies, gardens, communal relaxation areas away from polluted areas	Windows should be non-openable to the polluted façade	Contribution to new or improved traffic management measures and/or road infrastructure
	Investigate air quality with height. Air quality may improve with height (but not always) and if proven through an air quality assessment, sensitive receptors may be placed on higher stories	The mechanical ventilation must be suitable to prevent overheating	The management of car parking
Energy use must be considered with an emphasis on low energy and green energy usage		Contribution to the Air Quality Action Plan or Strategy	
A maintenance contract will be required		Contribution to the monitoring of air quality	
A monitoring strategy may be required		Measures during the construction of new development including dust control, site monitoring and plant emissions	



			Section 106 agreements. The Councils will use S106 Agreements, payments from the Community Infrastructure Levy (CIL)and unilateral undertakings to mitigate impacts from new development that are detrimental to air quality and are in or adjacent to or have a quantifiable impact on air quality in AQMAs by seeking contributions for measures of the type as described above.
--	--	--	---

Source: Air Quality Management and New Development 2011

3.3.12 Material Assets

Suffolk currently has its municipal waste collected by either kerbside collection or via community recycling ‘bring sites’. The need for waste disposal infrastructure refers to both bin collection and off-site disposal and processing alongside the provision of household waste and recycling centres. Due to the increased pressure placed on waste services per additional person, “every new development should make a contribution to the improvement and expansion of the existing waste network”.

From 2001 to 2002, 382,000 tonnes of municipal waste were generated in Suffolk, alongside 900,000 tonnes of waste generated by Commercial and Industrial waste producers and one million tonnes of inert construction and demolition waste.

Table 24: Primary Methods of Waste Collection and Management 2001/2002

	Residual Collection	Recyclable Collection	Compostable Collection	Residual Disposal	Recycling (2001/02)
Babergh	Wheeled bin weekly	Bring sites Kerbside via pink sacks fortnightly	Not collected separately	Landfilled at Gt. Blakenham	11.2%
Mid Suffolk	Sack Weekly	Bring sites	Not collected separately	Landfilled at Gt Blakenham	9.3%

Source: Air Quality Management and New Development 2011

There have been several major policies and programmes introduced since 2000 which include the following:

- Policy instruments to change behaviour: the landfill tax escalator, the landfill allowance trading scheme (LATS), the aggregates levy, regulations to implement a number of European directives on waste in specific sectors, including landfill, vehicles and packaging, and a new planning policy statement covering waste;
- New delivery arrangements to strengthen capacity and improve resource efficiency: DEFRA’s Waste Implementation Programme (WIP) and the Waste & Resources Action Programme (WRAP) with additional funding for local authorities (including the Private Finance Initiative) and the Business Resource Efficiency and Waste (BREW) programme; and
- Enforcement of waste regulations by the Environment Agency and local authorities as part of a

strategy to tackle illegal waste activity including the Clean Neighbourhoods and Environment Act 2005.

3.3.13 Data Limitations

Some relevant information is not available for the Plan area on a particularly detailed basis on all sustainability themes. As a result there are some quantitative gaps within the data set which would ideally have been identified. It is believed however that the available information shows a comprehensive view on sustainability within the Plan area as of the beginning of April 2019. Gaps in data can be expected to be rectified within the Regulation 18 Environmental Report, responding to the Plan's evidence base findings.

3.4 Sustainability Issues and Problems and the formulation of SA Objectives

The outcome of the above processes related to the identification of relevant plans and programmes and the baseline information profile of the Plan area is the identification of key sustainability issues. These amount to those sustainability problems facing the Plan area which assist in the finalisation of a set of relevant SA Objectives that can be subsequently expanded upon in a SA Framework.

The assessment of the Plan will be able to evaluate, in a clear and consistent manner, the nature and degree of impact and whether significant effects are likely to emerge from the Plan's content. The following table outlines the thought process which has led to the formulation of the SA Objectives for the Plan.

Table 25: Key Sustainability Issues and Problems

General theme	Description / Supporting Evidence
Economy	The Babergh & Mid Suffolk DC Joint Town Centres & Retail Study highlights a decline in shopping centre consumer patterns.
	There are barriers to growth within the Ipswich Economic Area which include: <ul style="list-style-type: none"> • Shortage of suitable and affordable business premises, including start-up premises; • Poor internet and broadband infrastructure; • Attracting and retaining skilled workers to the area; • Inefficiencies related to traffic congestion; and • Lack of capital and financing to support growth ambitions.
	Babergh is not identifiable as a known destination for business growth, partly because of its geographical location between Ipswich, Colchester and Bury St Edmunds
	There is an uneven distribution of services throughout Mid Suffolk and poor public transport.
	Suffolk has a low wage economy with median weekly gross earnings for full-time working (based on 2015 figures)

General theme	Description / Supporting Evidence
	being £460 for Babergh and £465 for Mid Suffolk, compared to the £532.40 national average
Housing	<p>House prices in Ipswich, Babergh and Suffolk Coastal have increased at a faster rate than the national average.</p> <p>The recent Housing Delivery Test, has indicated that Mid Suffolk has not met their housing targets over the past three years. In Babergh, housing targets were met in 2017/18, however the three year housing target was not met overall.</p> <p>There are approximately 10,687 properties in Suffolk that do not meet the Decent Home Standard under the Housing, Health and Safety rating because they are excessively cold</p> <p>There are high percentages of residents within Babergh and Mid Suffolk who live in rural areas, with 69% of Babergh's population and 75% of Mid Suffolk's population living in rural areas.</p> <p>Homelessness in Babergh had doubled within the period 2010-2014 and there are issues with the housing composition and affordability in Babergh and Mid Suffolk</p> <p>The majority of the homes across all tenures are large family units, with the owner occupied sector comprising of 72% of all homes</p> <p>The Suffolk Housing and Health Needs Assessment outlines that the number of people with a learning disability is forecast to increase by 9% by 2035, meaning that demand for housing which meets specialist needs is likely to increase.</p>
Health and well-being	<p>The key issues for Suffolk, as highlighted in the Joint Strategic Needs Assessment are as follows:</p> <ul style="list-style-type: none"> • 1 in 6 children live in relative poverty; • Educational attainment is below national rates; • Suffolk has a low wage economy although employment rates are higher than average; • General affluence masks pockets of deprivation and inequality gaps; • The comparative risk of dying prematurely has increased if you are from deprived areas of Suffolk; and • Suffolk has an ageing population. • 14% of children are living in low income families (as of 2016), 10% of households are experiencing fuel poverty and 2 homeless and in priority need per 1,000 households (2017-2018). <p>The NHS Strategic Plan had forecast (based on figures 2008-2013) that the number of people in Suffolk:</p> <ul style="list-style-type: none"> • With long-term health conditions caused by stroke will increase by 23%; • With long-term conditions caused by heart attack will increase by 24%; • Suffering from dementia will increase by 17.5%; • With type 1 or type 2 diabetes will increase by 31.5%; • With depression will increase by 23%; • Visiting A&E after having a fall will increase by 20%; • With a limiting long-term illness will increase by 22%; and

General theme	Description / Supporting Evidence
	<ul style="list-style-type: none"> Who are classed as obese will increase by 22.5%.
Transport and connectivity	<p>Both Babergh and Mid Suffolk benefit from some form of public transport provision, however due to the Districts being predominantly rural, a lot of these areas suffer from poor public transport links. Public consultations have identified a series of issues and priorities within Mid Suffolk as outlined below:</p> <ul style="list-style-type: none"> Concerns about traffic generated from new developments; Lack of investment in infrastructure; Lack of pavements in several villages; Public transport is limited in rural areas; Speeding traffic; The need for more cycle routes (especially in Stowmarket); Traffic generation reaching highway capacity on A14 road; Important links to nearby centres e.g. Ipswich, Bury, Diss, Harleston; and Economic importance to the business community of maintaining and improving infrastructure. <p>Key transport issues for Babergh (as per the LTP):</p> <ul style="list-style-type: none"> Sudbury bypass Sudbury town centre traffic management and Cross Street Air Quality Management Area Sudbury station Residents parking, long stay parking, lorry parking Hadleigh – local service, dial a ride Hadleigh Benton Street Lorry parking within the district A12, A14 and Copdock improvement Access to education (e.g. Suffolk One) Linking new strategic development to town centres Felixstowe to Nuneaton rail improvements to allow freight modal shift Speed and management of A134 <p>Key transport issues for Mid Suffolk (as per the LTP):</p> <ul style="list-style-type: none"> Stowmarket transport interchange Tackling congestion in Stowmarket Cycle network Rural bus provision Rural footpaths Local access to key services Lorry management
Historic	<p>Both Districts have an exceedingly high quality of historic environment, containing; areas, settlements and buildings of national significance. Meeting housing needs without causing harm to the historic environment will be</p>

General theme	Description / Supporting Evidence
Environment	<p>a key challenge for the Plan.</p> <p>Despite the Historic Environment being paramount to the character of both Districts, it is also extremely sensitive to change, and can be severely affected by inappropriate development.</p> <p>The Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils assessed the 42 settlements which have been identified as potential areas of residential expansion. The assessment identified eight settlements with cumulatively high value. These being: Boxford, Debenham, East Bergholt, Eye, Hoxne, Lavenham, Long Melford and Nayland.</p>
Biodiversity	<p>There are two Areas of Outstanding Natural Beauty (AONB) alongside Sites of Special Scientific Interest (SSSI), Ramsar and Special Protection Areas (SPA) within the Plan area.</p>
Landscape	<p>Large parts of Suffolk are protected for their wildlife or landscape value. Approximately 4% of this land area is designated as an SSSI and has two Areas of Outstanding Natural Beauty; the Suffolk Coast and Heaths and the Dedham Vale, both combined covering an area of 44,000ha (12%) of the land area. Proximity of homes to green space can add capital value of houses in England, highlighting the economic importance of incorporating green spaces within developments.</p> <p>Babergh's Landscape Character consists of a rolling and undulating landscape which was caused by regular incisions by both the River Gipping and River Stour. The distinctiveness of the 'Gipping Divide' has recently been acknowledged for its role as a significant historic cultural boundary.</p> <p>Mid Suffolk's Landscape Character is typically gently rolling plateau of heavy clay soils. Both the Waveney and Gipping Valleys are locally distinctive with the District.</p>
Water	<p>Due to Babergh and Mid Suffolk having numerous rivers run through their areas e.g. the River Gipping and River Brett, there is a need to ensure that not only the rivers are protected but that all water sources including groundwater are too.</p> <p>Natural England is committed to investing in protected area measures. This focuses on "safeguarding and where necessary improving the condition of Natura 2000 sites using measures such as river restoration, lake restoration, diffuse pollution, management of freshwater invasive species and habitat restoration on wetland sites."</p> <p>The presence of several bodies of water creates a risk of flooding and surface water flooding for sites within Babergh and Mid Suffolk. Along the river valleys there are areas of functional flood plain which can be incorporated into Green Infrastructure developments.</p>
Climate change and energy	<p>In Suffolk, domestic carbon dioxide emissions make up the majority of the county's emission. Transport was shown to be the second largest producer of emissions, closely followed by industry and commerce.</p> <p>The nature of Suffolk being mainly rural explains the high levels of dependence on the private car, as many villages and neighbourhoods are served by infrequent public transport or are in areas where public transport and alternatives are not available.</p>

General theme	Description / Supporting Evidence
	Babergh falls under the Anglian Water region, and Mid Suffolk under the Essex and Suffolk Water region – both area which are prone to drought. Due to water being imported from elsewhere in the country, there must be effective and reliable water systems in place to reduce any harm associated with droughts, ranging from small-scale water inefficiencies to large-scale ones.
Air	Despite both Districts being largely rural, pockets of diminishing air quality can be found.
	Generally, emissions from odours from sewage treatment plants, composting facilities or poultry and pig farms can also be detrimental to air quality, especially in rural areas like the majority of Babergh and Mid Suffolk.

The following table explores whether the identified SA Objectives above fall into the three broad categories of sustainability, namely social, environmental and economic themes.

Table 26: The SA Objectives

SA Objective	Environmental	Social	Economic
1. To improve the health and wellbeing of the population overall and reduce health inequalities		✓	
2. To maintain and improve levels of education and skills in the population overall		✓	
3. To reduce poverty and social exclusion and ensure access to jobs and services		✓	
4. To meet the housing requirements of the whole community		✓	
5. To conserve and enhance water quality and resources	✓		
6. To maintain and where possible improve air quality and reduce noise pollution.	✓		
7. To conserve soil and mineral resources	✓		✓
8. To promote the sustainable management of waste	✓		
9. To reduce contribution to climate change	✓	✓	
10. To reduce vulnerability and increase resilience	✓	✓	

SA Objective	Environmental	Social	Economic
to extreme weather events and flooding which may be caused by climate change			
11. To conserve and enhance biodiversity and geodiversity	✓		
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings	✓	✓	
13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	✓	✓	✓
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area		✓	✓
15. To revitalise the Districts' town centres		✓	✓
16. To encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth	✓	✓	✓

3.4.1 The Compatibility of the SA Objectives

A total of 16 SEA Objectives have been derived for the appraisal of the Plan. They are based on the scope of the document, policy advice and guidance and to the assessment of the current state of the environment.

It is useful to test the compatibility of SEA Objectives against one another in order to highlight any areas where potential conflict or tensions may arise. It is to be expected that some objectives are not compatible with other objectives thereby indicating that tensions could occur. Objectives which are based around environmental issues sometimes conflict with economic and social objectives, and vice versa.

Areas of potential incompatibility or uncertainty between the objectives relevant to the Plan are explained within the following bullet points:

- Protecting landscapes and townscapes and the majority of the economic and social based objectives:** Notionally, there can be expected to be a challenge to avoid harm in regard to minimising Greenfield development with all other objectives relevant to growth needs within the Plan area.
- Sustainable transport and the need to ensure access:** The promotion of the uptake of sustainable transport modes can be seen as potentially incompatible with the needs of ensuring appropriate linkages to the existing road network. Although truly sustainable outcomes can be seen to correspond to a modal shift to sustainable transport methods, notions of inclusivity determine that safe and efficient road access must also be ensured to reflect the baseline of car

ownership and the reality that sustainable transport modes can not be considered suitable for all demographics.

- **Health / open space and recreation based objectives with those associated with recreation and wildlife conservation / enhancement:** Although similar in form, it must be noted that the inclusion of recreational land should largely be provided in isolation from those areas that have been identified as contributing to green infrastructure. Similarly, land for purely landscape purposes should be managed in a way that offers either recreational or biodiversity value. The impacts of recreational activity on biodiversity and wildlife conservation can be significantly damaging to habitats.
- **Historic Environment conservation / enhancement with general development needs:** Historic Environment assets can come in many forms and in the built and natural environment. With this in mind, it is inevitable that there will be a degree of conflict between protection objectives and those that seek to ensure development needs are met.

3.5 The Approach to Assessing the Plan

3.5.1 Introduction

As previously set out, the Plan includes specific proposals, and detailed policies to ensure sustainable development within the Plan area over the Plan period.

The SA, in line with the scope of the Plan, is required to assess the impacts of the Plan's content. For this purpose, and as required of SA, a broad SA Framework relevant to the scope of the Plan area has been devised. The SA Framework takes the SA Objectives identified previously in this report as a starting point, and elaborates on each objective in turn with a series of criteria or 'key questions' to aid the assessment of the Plan's content in more detail.

3.5.2 The SA Framework for Assessing Policy Options

The following SA Framework forms the basis of the methods used to evaluate the effects of the Plan. Quantitative analysis is used where available; however a number of assumptions are required in order to make qualitative and comparable judgements to assess options to the same level of detail. It is important that a level playing field is ensured for the assessment of options, with the same level of information being used to assess all options. Assumptions are set out in the relevant sections of this SA in which specific elements of the Plan are assessed.

Additionally, the table below includes where any changes to the 2017 Scoping Report devised for the SA of the Plan have been made, alongside their justification.

Table 27: SA Framework for Assessing the Plan

Scoping Report (2017) SA Objectives	Proposed amendments to Objectives for Regulation 18 stage	Justification for changes to objective	Proposed guide questions to meet objective
1. To improve the health of the population overall	1. To improve the health and wellbeing of the population overall and reduce health inequalities	<p>The World Health Organisation (WHO) states that “wellbeing exists in two dimensions, subjective and objective. It comprises an individual’s experience of their life as well as a comparison of life circumstances with social norms and values”. Health is part of this.</p> <p>The addition of ‘and reduce health inequalities’ strengthens the objective to look at progress in narrowing the gap between different communities and socio-economic groups. It also accords with the approach taken by neighbouring authorities.</p>	<ul style="list-style-type: none"> • Will it improve access to, health facilities and social care services? • Will it encourage healthy lifestyles? • Will it support special needs and an ageing population? • Will it increase access to open countryside? • Will it increase access to public open space? • Will it improve access to cultural facilities? • Will it improve access to community facilities? • Will it reduce crime and anti-social activity? • Will it reduce noise and odour concerns? • Does the proposal explore opportunities for shared community use and co-location of services? • Does the proposal retain and enhance existing open and natural spaces? • Does the proposal provide a range of play spaces for children and young people?
2. To maintain and improve levels of education and skills in the population overall	2. To maintain and improve levels of education and skills in the population overall	No change.	<ul style="list-style-type: none"> • Will it improve qualifications and skills of young people and adults? • Will it support the provision of an adequate range of educational and child care facilities? / Does the proposal provide childcare facilities? • Does the proposal contribute to meeting primary, secondary and post 19 education needs?
3. To reduce poverty and social exclusion	3. To reduce poverty and social exclusion and ensure access to jobs and services	Access to jobs and services should lead to a reduction in poverty and social exclusion. The addition of text is intended	<ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas most affected? • Will it maintain and improve access to key services and facilities for all sectors of the population? /Does the proposal retain or re-



Scoping Report (2017) SA Objectives	Proposed amendments to Objectives for Regulation 18 stage	Justification for changes to objective	Proposed guide questions to meet objective
		to make the objective more precise. Ultimately reducing poverty and social exclusion is likely to be a key aim of the Plan's vision.	provide existing social infrastructure? <ul style="list-style-type: none"> • Will it reduce unemployment overall? • Does the proposal include a mix of uses and a range of community facilities? • Does the proposal include Lifetime Homes?
4. To improve the quality of where people live and work	Remove.	It is felt that this objective is broadly an accumulation of many social objectives within this SA framework. It is therefore difficult to identify specific, focused indicators. It is proposed that this objective is removed from the framework.	Guide questions from here have been moved to Objective 1.
5. To meet the housing requirements of the whole community	4. To meet the housing requirements of the whole community	No change.	<ul style="list-style-type: none"> • Will it meet the housing requirements of the whole community? • Will it reduce homelessness? • Will it contribute to meeting demand for a range and mix of housing including affordable housing and specialist housing? • Will it reduce the number of unfit homes? • Does the proposal include homes that can be adapted to support independent living for older and disabled people? • Does the proposal address the housing needs of older people, i.e. extra care housing, sheltered housing, lifetime homes and wheelchair accessible homes?
6. To conserve and enhance water resources	5. To conserve and enhance water quality and resources	Inserted quality to reflect best practice and the approach taken by neighbouring authorities.	<ul style="list-style-type: none"> • Will it protect and enhance water resources • Will it support the achievement of Water Framework Directive targets? • Will it protect and improve the quality of inland waters? • Will it protect and improve the quality of

Scoping Report (2017) SA Objectives	Proposed amendments to Objectives for Regulation 18 stage	Justification for changes to objective	Proposed guide questions to meet objective
			coastal waters? <ul style="list-style-type: none"> • Will it promote sustainable use of water? • Will it maintain water availability or water dependent habitats? • Will it support the provision of sufficient water supply and treatment infrastructure? • Does the proposal incorporate sustainable design and construction techniques?
7. To maintain and where possible improve air quality	6. To maintain and where possible improve air quality and reduce noise pollution.	Added noise pollution to reflect best practice.	<ul style="list-style-type: none"> • Will it protect and improve air quality? • Does the proposal minimise noise pollution caused by traffic and commercial uses? • Will it avoid exacerbating existing air quality issues in designated AQMAs? • Does the proposal incorporate sustainable design and construction techniques?
8. To conserve soil and mineral resources	7. To conserve soil and mineral resources	No change.	<ul style="list-style-type: none"> • Will it minimise the loss of open countryside to development? • Will it minimise loss of the best and most versatile agricultural land to development? • Does the proposal make best use of existing land? • Will it maintain and enhance soil quality? • Will it promote sustainable use of minerals?
9. To promote the sustainable management of waste	8. To promote the sustainable management of waste	No change.	<ul style="list-style-type: none"> • Will it reduce household waste generated /head of population? • Will it reduce commercial and industrial waste generated /head of population? • Will it increase rate/head of population of waste reuse and recycling? /Does the proposal encourage recycling (including building materials)? • Does the proposal incorporate sustainable design and construction techniques?
10. To reduce emissions of	9. To reduce contribution	Revised to take a broader focus on energy efficiency	<ul style="list-style-type: none"> • Will it reduce emissions of greenhouse gases/head of population by reducing

Scoping Report (2017) SA Objectives	Proposed amendments to Objectives for Regulation 18 stage	Justification for changes to objective	Proposed guide questions to meet objective
greenhouse gases from energy consumption	to climate change	and generation. This is an objective which could reference electric vehicles and battery technology.	energy consumption? <ul style="list-style-type: none"> • Will it increase the proportion of energy needs being met by renewable sources/ • Does the proposal incorporate renewable energy? • Does the proposal contain homes that are highly energy efficient?
11. To reduce vulnerability to climatic events	10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change	Revised to increase precision.	<ul style="list-style-type: none"> • Will it minimise the risk of flooding to people and property from rivers and watercourses? • Will it minimise the risk of flooding to people and property on the estuary? • Will it reduce the risk of estuarine erosion? • Will it reduce the risk of damage to people and property from extreme weather events? • Does the proposal incorporate sustainable design and construction techniques? • Does the proposal ensure that buildings and public spaces are designed to respond to winter and summer temperatures, i.e. ventilation, shading and landscaping? • Does the proposal incorporate sustainable urban drainage techniques?
12. To conserve and enhance biodiversity and geodiversity	11. To conserve and enhance biodiversity and geodiversity	No change.	<ul style="list-style-type: none"> • Will it maintain and enhance European designated nature conservation sites? • Will it maintain and enhance nationally designated nature conservation sites? • Will it maintain and enhance locally designated nature conservation sites? • Will it avoid disturbance or damage to protected species and their habitats? • Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan? • Will it help to reverse the national decline in farmland birds? • Will it protect and enhance sites, features

Scoping Report (2017) SA Objectives	Proposed amendments to Objectives for Regulation 18 stage	Justification for changes to objective	Proposed guide questions to meet objective
			<p>and areas of geological value in both urban and rural areas?</p> <ul style="list-style-type: none"> • Will it lead to the creation of new habitat? • Does the proposal maintain or enhance biodiversity?
13. To conserve and where appropriate enhance areas and assets of historical and archaeological importance	12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings	Added 'and their settings' for completeness.	<ul style="list-style-type: none"> • Will it protect and enhance buildings, monuments, sites, places, areas and landscapes of heritage interest or cultural value (including their setting) meriting consideration in planning decisions? • Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas? • Will it enhance accessibility to cultural heritage assets?
14. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	13. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	No change.	<ul style="list-style-type: none"> • Will it conserve and enhance the AONB? • Will it reduce the amount of derelict, degraded and underused land? • Will it protect and enhance the settlement and its setting within the landscape? • Will it protect and enhance landscape character?
15. To achieve sustainable levels of prosperity and economic growth throughout the plan area	14. To achieve sustainable levels of prosperity and economic growth throughout the plan area	No change.	<ul style="list-style-type: none"> • Will it improve business development and enhance competitiveness? • Will it improve the resilience of business and the economy? • Will it promote growth in key sectors? • Will it improve economic performance in disadvantaged areas? • Will it encourage rural diversification? • Will it encourage indigenous business? • Will it encourage inward investment? • Will it make land available for business development? • Is there a range of retail uses, including

Scoping Report (2017) SA Objectives	Proposed amendments to Objectives for Regulation 18 stage	Justification for changes to objective	Proposed guide questions to meet objective
			food stores and smaller affordable shops for social enterprises? <ul style="list-style-type: none"> Does the proposal include managed and affordable workspace for local businesses?
16. To revitalise the Districts' centres	15. To revitalise the Districts' town centres	No change.	<ul style="list-style-type: none"> Will it increase the range of employment opportunities, shops and services available in town? Will it decrease the number of vacant units in town centres? Will it enhance the viability and vitality of the Districts' centres?
17. To encourage efficient patterns of movement in support of economic growth	16. To encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth	Added in sustainable travel to acknowledge that where movement is necessary, then sustainable means of travel must be prioritised.	<ul style="list-style-type: none"> Will it reduce commuting? Will it improve accessibility to work by public transport, walking and cycling? Would it promote the use of sustainable travel modes and reduce dependence on the private car? Will it increase the proportion of freight transported by rail or other sustainable modes?

3.5.3 The SA Framework for Assessing Site Options

The following SA Framework forms the basis of the methods used to evaluate the effects of the Plan's site allocations and reasonable alternatives. Quantitative analysis is favoured to assess options to the same level of detail and to aid the LPA in the selection / rejection of options. To this extent, it should be noted that any site information that has been submitted as part of or accompanying any planning application, where this is the case for any site option, has been omitted from consideration unless there is a comparable level of information coming forward in this manner for all site options in the Plan area. It is important that a level playing field is ensured for the assessment of options, with the same level of information being used to assess all options. It should also be recognised that the assessment of sites within the forthcoming SA Environmental Report is a strategic undertaking and the level of assessment is commensurate to the level of detail required of a planning policy document.

The framework in the following table outlines the methodology for assessing site options, including how quantitative information relates to certain degrees of impact or effect. The broad SA Objectives identified in this SA Scoping Report have been replicated in this framework as they represent the key issues and



objectives for the Plan area. Expanding on these, quantifiable information is used where relevant related to each of these objectives.

It should be noted that the assessment of options at the Plan level within this SA Environmental Report is a strategic undertaking (unlike project level environmental assessment work such as Environmental Impact Assessments) and the information presented can only be used within this specific context.

A lot of work has been undertaken by the LPA in assessing sites within Babergh and Mid Suffolk, specifically through the Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA has filtered or 'sieved' out sites based on absolute constraints, which has left a shortlist of sites that are considered notionally suitable for consideration. To this extent 'significant' effects are not identified within individual site appraisals as any site with such an effect has not been included within the SHELAA. Significant effects will be identified only through the cumulative analysis of sites in unison.

The SA Framework in the following table uses draws upon some of this information (methodology and assessment findings) where relevant.

A NOTE ON 'UNCERTAIN IMPACTS / EFFECTS' IN THIS SA:

Within the following SA Framework for the assessment of site options, a degree of impact is highlighted as 'uncertain'.

It should be acknowledged that within the assessment of site options 'uncertain' impacts can 'lean' towards either positive or negative impacts, and these additional degrees of impact will be highlighted within option assessments where relevant .

Additionally, it should also be acknowledged that 'uncertain' impacts will only be highlighted where 'positive' or 'negative' impacts can not be predicted with any assurance or where there is a lack of reliable quantitative information that can be used to predict impacts (or when the only available information is considered qualitative / anecdotal).



Table 28: SA Framework for Assessing the Plan's Site Options

Sustainability Objective	Site Criteria	Source	Positive (+)	Negative (-)	Uncertain / Unknown (?)	Neutral impact (0)
1. To improve the health and wellbeing of the population overall and reduce health inequalities	(1.1) Will the site see a loss of land classified as 'open space'?	SHELAA	Proposal includes additional open space	Loss of open space, no compensation	Where applicable	No net loss of open space
	(1.2) Accessibility to local services and facilities	GIS mapping / SHELAA Core services will be considered as: <ul style="list-style-type: none"> A primary school A secondary school A local healthcare service (doctors' surgery) Retail and service provision for day to day needs (district/local shopping centre, village shop) Local employment opportunities (principally existing employment sites, but designated or proposed employment area in a local plan will also be considered) For rural districts, a peak-time public transport service to/from a higher order settlement (peak time for the purposes of this criterion will be 7-9am and 4-6pm) 	Where there are 4+ core services within 800m/10 minutes walking distance	N/A	Where applicable	Where there are 1 to 3 core services within 800m/10 minutes walking distance



2. To maintain and improve levels of education and skills in the population overall	(2.1) Is there capacity in primary schools?	Suffolk County Council and IDP.	This criterion is considered a policy consideration only. Impacts will be identified at the 'whole plan level' related to overall infrastructure in consideration of sites and policy together.			
	(2.2) Is there capacity in secondary schools?	Suffolk County Council and IDP.	This criterion is considered a policy consideration only. Impacts will be identified at the 'whole plan level' related to overall infrastructure in consideration of sites and policy together.			
	(2.3) Fibre broadband availability	Better Broadband for Suffolk rollout map.	Fibre or wireless broadband available or Fibre broadband planned or underway to be completed by December 2019	Not in plans for an upgrade to superfast broadband or no broadband coverage	Where applicable	Where applicable
3. To reduce poverty and social exclusion and ensure access to jobs and services	(3.1) Distance to main employment areas	GIS / Aerial Mapping	Less than or equal to 500-1,000m from existing employment area	n/a	More than 2,000m from an existing employment area	Where applicable
	(3.2) Relationship / distance to Enterprise Zones (Stowmarket Enterprise Park / Sproughton Enterprise Park)	Aerial mapping	Less than or equal to 500-1,000m from an Enterprise Zone	n/a	More than 2,000m from an Enterprise Zone	Where applicable
4. To meet the housing requirements of the whole	(4.1) Will the site meet local thresholds for affordable	This is a policy issue and will not be assessed in the site assessment.				



community	housing?					
	(4.2) Will there be a suitable housing mix?	This is a policy issue and will not be assessed in the site assessment.				
	(4.3) Is the proposed housing density appropriate?	This is a policy issue and will not be assessed in the site assessment.				
5. To conserve and enhance water quality and resources	(5.1) Proximity of any water bodies	GIS SHELAA layers	Over 100m	n/a	Within 100m	N/A
	(5.2) Is the site within a ground water source protection zone?	GIS mapping	Not in GPZ	Within outer zone (Zone 2, Zone 2c) Within inner zone (Zone 1, Zone 1c)	Within total catchment (Zone 3)/ where applicable	Where applicable
6. To maintain and where possible improve air quality and reduce noise pollution.	(6.1) Is the site in close proximity to road traffic?	GIS SHELAA layer	Site is not within 35m of the central reservation or centre of the A14/ A140/A12/A143/A137/ A1071/A1141	Site is within 35m of the central reservation or centre of the A14/ A140/A12/A143/A137/ A1071/A1141	Where applicable	Where applicable
	(6.2) Is the site within proximity to mineral extraction or waste management	Allocations in the Adopted Minerals Local Plan (2014) and the emerging Replacement Waste Local Plan (ongoing)	Site is beyond 250m of either an existing or proposed site for mineral extraction or a site either existing as	Site is within 250m of either an existing or proposed site for mineral extraction or a site either existing as	Where applicable	Where applicable



	facilities?		or allocated for a waste management facility.	or allocated for a waste management facility.		
7. To conserve soil and mineral resources	(7.1) Will the site result in a loss of best and most versatile agricultural land?	Agricultural Land Classification (ALC) from the SHELAA assessment on "Landscape, Strategic Gap and Agricultural Land"	Grade 3 or 4 or 5 Urban area / extension to an existing site / Other land primarily in non-agricultural use	Grade 2/Grade 1	Where applicable	Where applicable
8. To promote the sustainable management of waste	This SA Objective is considered a policy consideration only.					
9. To reduce contribution to climate change	There will not be a comparable level of information available to assess all sites against this objective – features that would reduce contributions to climate change would only be known at the proposal / application stage.					
10. To reduce vulnerability and increase resilience to extreme weather events and flooding which may be caused by climate change	(10.1) Is the site within a flood risk zone	GIS mapping of SHELAA sites SHELAA assessment on "Flood Risk"	Site contains a minimum of 80% Flood Zone 1	N/A	Uncertain (to include commentary in appraisal)	Where applicable
	(10.2) Is the site in an area of high / medium / low / very low risk of flooding from surface water?	SCC data	Very low Low	High	Medium Risk/ on zone boundary/ Where applicable	Where applicable
11. To conserve and enhance biodiversity and	(11.1) Is the site within the ZOIs of a Habitats Site(s) or the IRZ of a	GIS mapping/SHELAA	Site is not within an IRZ	n/a	Site is within an IRZ	Where applicable



geodiversity	SSSI(s)					
	(11.2) NNRs / LoWS / LNR / CWS / Ancient Woodland	GIS mapping / SHELAA	Development would not have a detrimental impact	Development likely to have a detrimental impact	Where applicable	Where applicable
	(11.3) Will it lead to the creation of new habitat / biodiversity net gain?	This criterion is considered a policy consideration only. Impacts will be identified at the 'whole plan level' related to overall infrastructure in consideration of sites and policy together.				
	(11.4) Regionally Important Geological/ Geomorphological Sites (RIGS) / County Geographical Sites	GIS mapping/SHELAA	Development would not have a detrimental impact	Development likely to have a detrimental impact	Where applicable	Where applicable
12. To conserve and where appropriate enhance areas and assets of historical and archaeological importance and their settings	(12.1) Might the site have an impact on, or harm the significance of, historical assets	<p>Historical assets are defined as:</p> <ul style="list-style-type: none"> • Scheduled (Ancient) Monuments • Listed Buildings • Registered (Historic) Parks and Gardens • Conservation Areas • Heritage assets (local lists [including Historic Park or Garden identified by SCC]) • Sites of known archaeological value 	No harm to the significance of a heritage asset or mitigation of any potential harm possible.	Harm to the significance of a heritage asset.	Where applicable	Where applicable.
13. To conserve and enhance the	(13.1) Is the site in an area noted	Heritage and Settlement Sensitivity Assessment for Babergh and Mid Suffolk District Councils,	"Low" or "Medium/Low" sensitivity to change	"High" sensitivity to change	"Medium/High" sensitivity to change	Where applicable



quality and local distinctiveness of landscapes and townscapes	for its high sensitivity to change?	March 2018				
	(13.2) Will any Tree Preservation Orders (TPOs) be affected?	SHELAA GIS layers	No TPO(s) on site	TPO(s) on site	TPO(s) adjacent to site	Where applicable
	(13.3) Is the site greenfield or brownfield?	SHELAA	Approximately 50% brownfield / greenfield	n/a	Greenfield	Where applicable
	(13.4) Is the site within Development Limits?	Current development limits and site boundary SHELAA	Site is predominantly within development limit/Site is outside but adjacent to development limit/Site is relatively well related to existing settlement(s)	Site is poorly related to the functional settlement/Site is in open countryside/ detrimental impact on sensitive townscapes which cannot be mitigated.	Where applicable	Where applicable
14. To achieve sustainable levels of prosperity and economic growth throughout the plan area	(14.1) Is the site proposed for employment development / loss of employment land?	Call-for-Sites information as submitted	Site is proposed for employment/ Site is proposed for mixed-use development with employment	Proposal will see a loss of identified appropriate employment land	Where applicable	Other uses
	(14.2) Will there be a loss of employment land (housing allocations)	Call-for-Sites information as submitted	Site is not currently employment land	Proposal will see a loss of identified appropriate employment land	Where applicable	Where applicable



	(14.3) Will the proposal increase rural employment opportunities in a sustainable location?	Call-for-Sites information as submitted Aerial mapping	Employment proposals in rural areas / the countryside (as defined) within or adjacent to existing development boundaries	n/a	Employment proposals in rural areas / the countryside (as defined) physically separated from existing development boundaries	Where applicable
15. To revitalise the Districts' town centres	(15.1) Is the proposal for retail and suitable for a town centre location?	Call-for-Sites information as submitted	The proposal is for retail and within a defined town centre/The proposal is for mixed-use development (Inc. retail) within a defined town centre.	The proposal is for retail and not well related to the defined town centre	Where applicable	Where applicable
	(15.2) Is the proposal for leisure and suitable for a town centre location?	Call-for-Sites information as submitted	The proposal is for leisure and within a defined town centre/The proposal is for mixed-use development (Inc. leisure) within a defined town centre.	The proposal is for leisure and not well related to the defined town centre	Where applicable	Where applicable
	(15.3) Is the proposal for office space and suitable for a town centre location?	Call-for-Sites information as submitted	The proposal is for office space and within a defined town centre/The proposal is for mixed-use development (Inc.	The proposal is for office space and not well related to the defined town centre	Where applicable	Where applicable



			office space) within a defined town centre.			
16. To encourage efficient patterns of movement and the use of sustainable methods of travel in support of economic growth	(16.1) Is the site well located to transport networks.	SHELAA "Access to wider transport networks"	<p>Housing sites: within 10km of the strategic road network or railway station and good access to a B-road</p> <p>Office-based employment: good public transport access within walking distance / good direct cycling route</p> <p>Storage and distribution: easily accessed within 2km of a Trunk Road or A class Road via unconstrained roads is considered good</p>	<p>Housing sites: 10km+ from the strategic road network or railway station and poor access to a B-road</p> <p>Office-based employment: poor public transport access / not within walking distance / poor walking and cycling routes.</p> <p>Storage and distribution: 5km+ from a Trunk Road or A class Road or accessed through constrained/local roads and/or through a town centre or residential area</p>	Where applicable	<p>Housing sites: within 10km of the strategic road network or railway station and poor access to a B-road</p>
	(16.2) Is the highway network at capacity?	Transport modelling	Any highway capacity issues can be adequately mitigated.	Local network near or at capacity with limited mitigation options/ Local network over capacity.	Where applicable	Where applicable

3.6 The Assessment of the Plan's Content

The SA of the Plan assesses the document's policies against the SA Objectives (SOs) outlined in the above frameworks. The aim is to assess the sustainability effects of the document following implementation. The assessment will look at the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary effects in accordance with Annex 1 of the SEA Directive, as well as assess alternatives and suggest mitigation measures where appropriate. The findings will be accompanied by an appraisal matrix which will document the effects over time.

The content to be included within the table responds to those 'significant effects' of the policy or element of the Plan subject to assessment. Assessments will also look at the following:

- Temporal effects;
- Secondary, Cumulative and Synergistic effects;
- The assessment of Alternatives; and
- Proposed mitigation measures / recommendations.

These, and 'significant effects' are further described in the following sub-sections.

3.6.1 Description of 'Significant Effects'

The strength of impacts can vary dependant on the relevance of the policy content to certain SA Objectives or themes. Where the policies have been appraised against the SA Objectives the basis for making judgements within the assessment is identified within the following key:

Possible impact	Basis for judgement
++	Strong prospect of there being significant positive impacts
+	Strong prospect of there being minor positive impacts
?	Possibility of either positive or negative impacts, or general uncertainty where there is a lack on current information (to be elaborated in commentary in each instance)
0	No impact
-	Strong prospect of there being minor negative impacts and mitigation would be possible / issues can be rectified
--	Strong prospect of there being significant negative impacts with mitigation unlikely to be possible (pending further investigation) / further work is needed to explore whether issues can be rectified
N/A	Not applicable to the scope or context of the assessed content

Commentary is also included to describe the significant effects of the policy on the sustainability objectives.

3.6.2 Description of 'Temporal Effects'

The assessment of the Plan's content recognises that impacts may vary over time. Three time periods have been used to reflect this and are shown in the appraisal tables as S (short term), M (medium term) and L (long term). For the purpose of the policy elements of the Plan S, M and L depict:

(S) Short term: early stages of the plan period

(M) Medium Term: middle stages of the plan period

(L) Long term: latter stages of the plan period and where relevant beyond.

3.6.3 Description of 'Secondary, Cumulative and Synergistic Effects'

In addition to those effects that may arise indirectly (secondary effects), relationships between different elements of the Plan will be assessed in order to highlight any possible strengthening or weakening of impacts from their implementation together. Cumulative effects respond to impacts occurring directly from two different policies together, and synergistic effects are those that offer a strengthening or worsening of more than one policy that is greater than any individual impact. Additionally, any cumulative impacts with other plans or projects will be highlighted within the assessment.

3.6.4 Description of 'Alternatives Considered'

Planning Practice Guidance states that reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

3.6.5 Description of 'Proposed Mitigation Measures / Recommendations'

Negative or uncertain impacts may be highlighted within assessments. As such, mitigation measures may be needed and these will be highlighted in this section for each policy where relevant. In addition to this, this section will also include any recommendations that are not directly linked to negative or uncertain impacts, but if incorporated may lead to sustainability improvements.





Place Services

Essex County Council

County Hall, Chelmsford, Essex CM1 1QH

T: +44 (0)333 013 6840

E: enquiries@placeservices.co.uk

www.placeservices.co.uk

April 2019



Essex County Council